



Supplier Code of Conduct

INTRODUCTION

At Klöckner Pentaplast (kp), we are committed to operating ethically to help maximize the long-term sustainability of our business in which we operate. We aim to comply with all laws, rules, and regulations governing our activities and, in addition, have developed a framework of policies to help drive high ethical standards.

We strive to conduct business with suppliers who share our commitment to high ethical standards and operate in a responsible way. Our commitment also allows us to give our customers the best product possible.

In addition to complying with applicable laws and regulations, kp expects that our suppliers share the same core values. We require that our suppliers operate ethically by adhering to this Supplier Code of Conduct (the “Supplier Code”) which provides guidance for doing business with kp. We are committed to continually improving our operations and expect our suppliers to promote similar principles throughout their supply chain.

Kp’ Supplier Code is informed by the United Nations Guiding Principles on Business and Human Rights and the Core Conventions of the International Labour Organization (ILO), including the ILO Declaration on Fundamental Principles and Rights at Work.

LABOUR & EMPLOYMENT

1. Freely Chosen Employment – Suppliers shall not, and shall not permit temporary service agencies or contract manufacturers that perform services on their behalf, to use forced, bonded or indentured labor. Additionally, suppliers shall not support, promote or engage in the practice of slavery or human trafficking including by way of payment of recruitment fees.

2. Child Labor– Suppliers shall not use child labor in violation of any applicable law in countries where Suppliers operate and must comply with all other applicable child labor laws.

3. Freedom of Association – Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions or workers’ councils and to seek representation.

4. Wages, Benefits and Working Hours – Suppliers shall pay workers in a timely manner and in accordance with applicable laws, including laws regarding minimum wages, working hours, overtime hours and mandated benefits. We also encourage suppliers to regularly evaluate whether workers earn enough to meet their basic needs and the needs of their family.



5. Discrimination – Suppliers must not discriminate in hiring or employment practices on the basis of race, religion, gender, disability, nationality, veteran status, political beliefs or of any other protected class.

CONFLICT MINERALS

6. Conflict Minerals – Suppliers shall ensure that products supplied to kp do not contain metals derived from conflict minerals and suppliers must comply with all applicable laws and regulations concerning the sourcing of minerals from conflict areas.

ETHICAL BEHAVIOUR

7. Anti-Corruption and Business Integrity – All forms of corruption are prohibited. Suppliers shall not directly or indirectly offer, pay, promise or accept bribes or participate in other illegal inducements with public or private parties for the purpose of gaining favorable treatment. Suppliers shall abide by all applicable anti-corruption laws and regulations in the countries in which suppliers conduct business.

8. Fair Competition – Suppliers shall conduct their business consistent with applicable competition laws.

9. Conflicts of Interest – Suppliers shall not engage in any activity that could create a conflict of interest.

10. Legal Requirements – Suppliers shall fully comply with all laws, rules and regulations applicable to the countries in which they operate.

HEALTH & SAFETY

11. Health & Safety - Suppliers shall provide employees with a safe and healthy workplace in accordance with applicable local and national laws, and protect employees from chemical, biological and physical hazards. Additionally, suppliers shall ensure that employees have reasonable access to toilet facilities and clean drinking water.

12. Quality & Product Safety - Suppliers shall ensure that all products and services provided meet the quality and safety standards required by applicable law and any applicable specifications and quality standards.



ENVIRONMENT AND SUSTAINABILITY

13. Environment – Suppliers shall operate in an environmentally responsible manner. At a minimum, suppliers shall comply with all applicable environmental laws and regulations.

14. Sustainability – As a company, kp seeks to create a sustainable environment and we ask our suppliers to do the same. Our suppliers should strive to improve their own environmental performance and reduce their environmental footprint.

MANAGEMENT PRACTICES

15. Business Continuity – Suppliers are responsible for the development and implementation of appropriate business continuity plans for operations supporting kp's business.

16. Commitment and Accountability – Suppliers are encouraged to fulfill the requirements described in this Supplier Code by allocating appropriate resources.

17. Confidentiality – Suppliers shall hold kp information in strict confidence and shall not disclose such information to any unauthorized third party.

18. Compliance Assessment – Suppliers are expected to monitor their own compliance with this Supplier Code. kp reserves the right to assess suppliers' compliance with this Supplier Code through use of kp personnel or third parties.

QUESTIONS AND CONCERNS

You should never hesitate to contact kp's Compliance Officer with any questions or inquiries about how this Supplier Code may be relevant to your duties. If you have concerns or become aware of a potential violation of this Supplier Code, please report such concerns and potential violations to kp's Compliance Officer, Susan Fornaro, E-Mail: compliance@kpfilms.com.