



CODE OF CONDUCT

OF PTS PLAST - BOX S.A. & STARK PARTNER SP. Z O.O.
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ABOUT US



PTS Plast-Box S.A. is one of the most modern enterprises in Europe producing plastic packaging. We have existed since 1983. Stark Partner Sp. z o. o. was established almost 3 decades ago and was purchased in 2018 by PTS Plast-Box S.A. During this time, we have undergone dynamic changes, starting from small family businesses to a modern Group with a European reach.

The key document that describes the goals and direction of our activities is the Integrated Management System Policy. We conduct business activities based on it, taking into account the ethical, social and environmental responsibility. Our Code of Conduct results from this document and expands its scope, detailing key provisions based on expectations posed by the market.

ABOUT US

The development strategy of both companies is based on maintaining a balance between striving to achieve economic success and caring for having positive relationships with employees, contractors and partners, the local communities in which we operate, as well as the natural environment that surrounds us. Applying the rules of sustainability is essential to our success in the business, social and environmental dimensions; therefore, we consistently strive to implement its individual elements on a daily basis.

To ensure that the initiatives and activities undertaken in this area are effective, we have established the Sustainability Team whose primary task is to define and take actions to implement the legal requirements and other requirements in the field of Sustainable Development, to communicate to employees and relevant stakeholders information related to the implementation of tasks resulting from the requirements of sustainable development and responsible business.



PLAST BOX

POLSKA - SŁUPSK

STARK

POLSKA - URSZULIN

WHO DOES THE CODE APPLY TO?

This Code applies to all employees and third parties cooperating with our companies. By employees we mean people working at all levels and positions, including senior managers, managers, directors and (permanent, fixed-term, temporary) employees, subcontractors, interns, delegated staff, home workers, seasonal workers and temporary staff and volunteers.

By third parties we mean all third-party suppliers, service providers, representatives, business partners, consultants, charities, advisors or entities acting on a commission basis and engaged by us.

Managers who manage the work of other employees must ensure that their teams are familiar with and follow the provisions of this Code. Employees must comply with this Code and ensure that third parties receive, comply with and verify whether their employees and subcontractors behave in accordance with the Code when doing business with us.

APPLYING THE CODE IN PRACTICE



WHEN WORKING FOR OR COOPERATING WITH OUR COMPANIES, WE EXPECT THAT SEVERAL BASIC PRINCIPLES ARE MET:



We do not tolerate inappropriate behaviour and, regardless of the hierarchy, we express our doubts to our employees and third parties if this type of behaviour occurs.



All our products are safe and suitable for their intended purpose. Quality matters.



If we notice any irregularities, we take action, without any fear of retaliation.



The client matters most to us. Everything we do, we do keeping the benefit of our clients in mind.



Safety is a priority.



We show respect to every person who we work with. We are all different and this is the source of our strength. We always try to act in the right way, no matter how difficult it may be.



We conduct our business in an ethical manner, respecting human rights and environmental protection.



We do not tolerate retaliatory actions against employees or third parties who reported in good faith a suspected breach or a breach in our Code or company policy or standard.



We comply with the law. Always.

OUR VALUES

AND BUSINESS RELATIONSHIPS

We build business relationships on such values as transparency, honesty and trust, and the key to our success is continuous work on quality improvement and customer service focused on quick responses to their needs and requirements. We attach great importance to the origin of our products and raw materials, and we require that they be obtained ethically and legally.

We will always act towards each other, our business partners, including clients and suppliers, in an honest and fair manner, respecting human rights.

Our suppliers are selected based on such factors as quality, service, price, sustainability and delivery. We carry out audits at high-risk suppliers and work with them to continually raise the standards and ensure that the human rights of employees in the supply chain are respected.





MUTUAL TREATMENT



We respect the human rights, fundamental rights and freedoms to which we are entitled, regardless of factors such as nationality, race or gender. We expect everyone we work with to be held to high standards, respect human rights and take appropriate steps to protect employees against discrimination.

All employees of third-party companies who cooperate with us must know what acceptable behaviour, consistent with our standards and the legal regulations, is like. Our potential is people, which is why we make every effort to provide employees with appropriate working conditions, a friendly atmosphere full of mutual respect and understanding, as well as opportunities for their development.

We provide equal opportunities to all employees. We do not tolerate discrimination in such matters as age, gender, ethnicity, race, nationality, faith or beliefs, sexual orientation, gender change or disability. We appreciate the richness of diversity, we make every effort to promote a culture of equality and diversity, bearing in mind that people with different backgrounds and experiences provide a valuable contribution to the activities of our company.

We protect the health and safety of employees, clients, subcontractors and other guests.

HEALTH AND SAFETY

OF THE WORKING ENVIRONMENT

In our daily work, we all must demonstrate personal responsibility for our shared work environment, safety and your own health. We comply with all legal standards in this regard.

We ensure that the quality standards for physical (lighting, noise, microclimate), chemical (e.g. paint, industrial solvents) and biological (viruses, bacteria) factors occurring both in the workplace and in the surroundings are maintained. Appropriate tools and control processes are used for this purpose. We constantly improve the quality of the working conditions, and we identify threats and sources of risk.

We comply with statutory working hours, which run according to established schedules. Every employee is paid for their work in the form of remuneration determined under the employment contract. We ensure appropriate rest time, both short- (breaks) and long-term (holidays).



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect employees' rights to organise as permitted by law, including negotiations regarding their common interests, in a safe manner, free from repressive actions, such as intimidation, harassment or termination of employment. Our Management Board responds favourably to crew initiatives to implement alternative methods of implementing our employees' demands and interests.

We follow the rules of fair negotiations, we do not make promises and declarations that we are unable to keep. The purpose of negotiations is to build the company's credibility in business contacts.

We have implemented business processes (procedures) that regulate key negotiation aspects. Our representatives are obliged to comply not only these procedures, but the generally accepted standards of good behaviour in business ethics.



WORKING CONDITIONS AND CHILD LABOUR



All our activities are consistent with the applicable labour code. When hiring, we apply the principle of voluntariness and matching competences to the assigned tasks. Respect for dignity is ensured with the simultaneous lack of acceptance for harassment and discrimination.

The basis for employment in our company is a formal employment contract, and the entire remuneration is paid on the basis of the applicable legal acts. We place much emphasis on employee motivation, based on a system of monthly and quarterly bonuses. We value loyalty and long-term relationships.

Our managers actively participate in modelling the employment and remuneration policy. Any comments and ideas are communicated in a fully open and transparent way. We take care of the constant development of employees through in-house and external training.

We consider the abuse of children to be completely unacceptable and deeply unethical because it deprives them of their childhood, potential and dignity. We fully respect the legal requirements applicable in our country regarding personnel, and thus we do not employ or use children in any activities.

MODERN SLAVERY

We strongly dissociate ourselves from using it and we do not tolerate any form of modern slavery, serfdom, forced labour or human trafficking within the scope of our activities or in our supply chain. The Management Board of our company promotes transparency, ethical conduct and commitment to compliance with regulations against slavery and human trafficking, including modern slavery (for debt, international trafficking of children, forced labour work of prisoners in labour camps).

Preventing, detecting and reporting modern slavery is the responsibility of all our employees and partners.



ENVIRONMENTAL PROTECTION

We comply with applicable legal provisions regarding environmental protection and we care about protecting the surrounding natural world by taking actions and applying solutions aimed at minimising the impact of the services we provide on the natural environment.

We create our products in accordance with the idea of sustainable development and environmental responsibility. Packaging made in accordance with the rules of sustainable development reaches increasingly aware recipients, who are looking for functional and distinctive packaging. Maintaining and improving the features of our packaging and making it friendly for the environment is our indispensable goal.

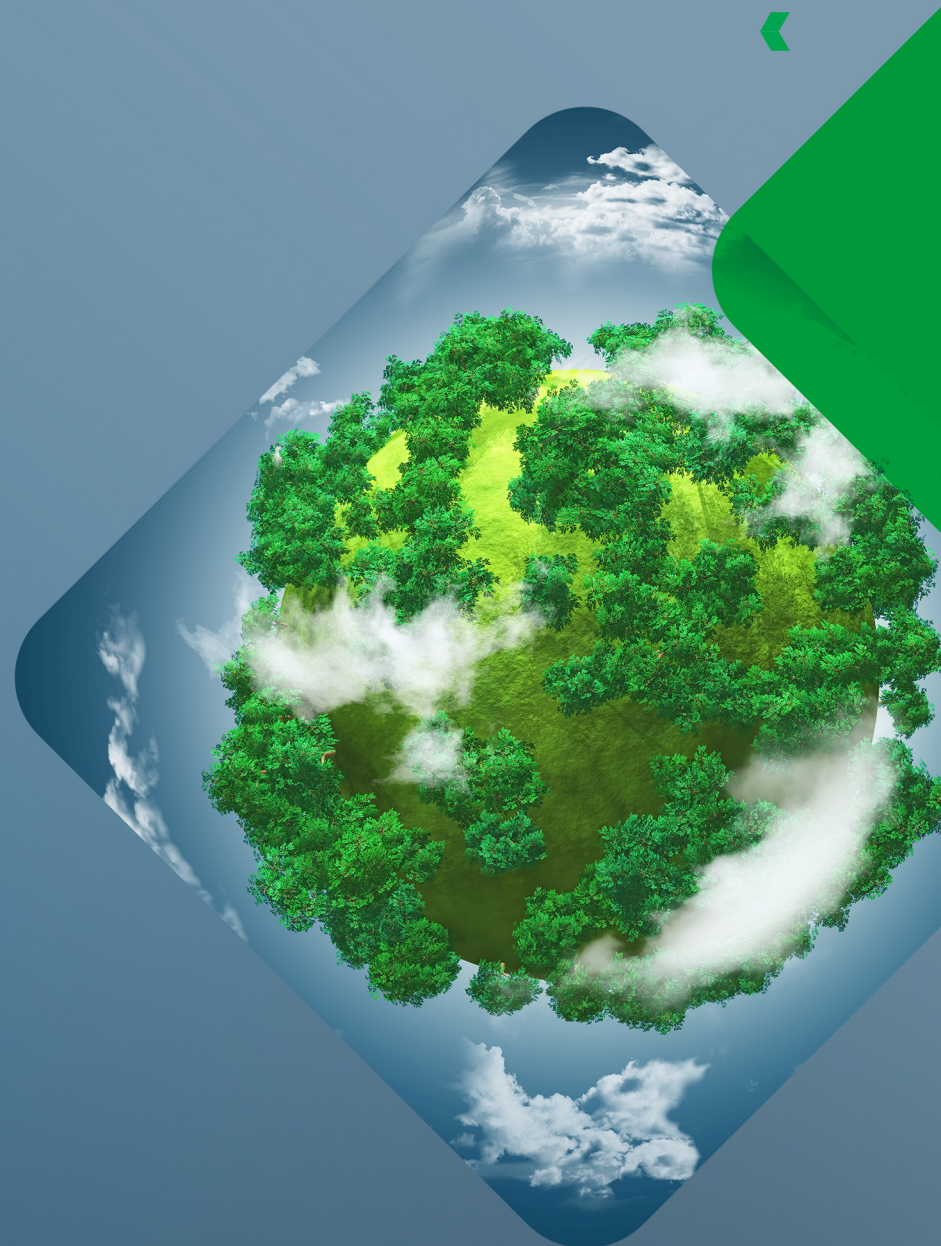
We all have a role to play in protecting the environment, and we expect that the suppliers who work with us will help us achieve our goals and achieve compliance with the standards related to environmental protection.

SUSTAINABLE DEVELOPMENT

We all need the right environment to work and space to live. That is why we try to be environmentally friendly, ethical and sustainable in our activities. Our Sustainability Team defines the plans and tasks to meet the legal and other requirements in the field of Sustainable Development. Simultaneously it communicates to employees and relevant stakeholders key information related to the implementation of activities resulting from the requirements of sustainable development and responsible business. At the stage of implementation of investment projects, we select everything to meet important ecological aspects, applying the principle of reduction at source, which allows for the production of increasingly lighter packaging. Thanks to this, we reduce the amount of raw material used, the number of vehicles in transport and their routes, to reduce our CO2 emissions into the atmosphere.

We only buy modern and energy-saving machines, which allows us to constantly improve our energy balance. At PTS Plast-Box S.A. we have replaced the lighting of production areas and warehouses with energy-saving solutions. Water that is used to cool the production processes is used to heat the building.

In line with the closed loop philosophy, all the materials used to produce packaging are 100% recyclable in Słupsk. We completely recycle our production waste. The material obtained in this way (PIR), after consultation with the client, is added at the appropriate dose to packaging intended for the chemical industry. We continue increase the share of secondary raw material (PCR), purchased externally and used in our packaging. In Urszulin, we recycle production waste that is suitable for processing and can be used to produce packaging in a closed loop.



SUSTAINABLE DEVELOPMENT

We segregate waste (foil, metal, waste paper) and recycle it through specialised external companies.

We issue e-invoices to our clients and accept e-invoices from our suppliers. We are constantly digitising the processes to reduce the consumption of paper, and therefore reducing the cutting down of trees. We focus on educating producers and consumers, conducting pro-social and pro-ecological activities at primary schools, such as through special lessons on ecology and recycling.

In our work, important points of reference are the expectations of our neighbours and conducting business in such a way that our relationships with our surroundings are as harmonious as possible. At PTS Plast-Box S.A. we have reduced noise emissions by casing the raw material transmission lines leading from the silos to the production areas.

We are constantly increasing our share of energy from renewable sources. We have installed photovoltaic panels at the production facilities in Słupsk, and they must be installed in all new facilities. We also intend to do this in other locations.

We are also changing the fleet of our employees, moving from traditional engines through hybrids to electrical cars. We are building charging stations in Słupsk, not only for our electric cars but also for use by our guests, to encourage them to use such means of transport.





WORKING WITH SUPPLIERS

We make our sourcing decisions on the basis of individual factors, such as quality, service, price, sustainability, honesty and execution.

We attach great importance to the origin of our raw materials and we require that they are obtained in a legally and ethically valid way. Suppliers must ensure that production facilities and workplaces meet our requirements in relation to human rights and practices regarding employment and the environment, in line with our standards.

We conduct audits of high-risk suppliers and cooperate with them to continually raise our standards and ensure that the human rights of workers in the supply chain are respected.

FIGHTING CORRUPTION AND BRIBERY

CONFLICTS OF INTEREST



All people working in the company are obliged to avoid relationships and circumstances that could create ethically questionable situations. Invitations must be within standard limits of business hospitality.

We strictly adhere to the prohibition of obtaining material benefits in the form of money from our suppliers and other business partners. We treat violating such a ban as a flagrant violation of official duties.

We only accept hospitality or gifts from our clients if this is in accordance with the tax and legal regulations applicable in a given country and does not create any impression of trying to influence business decisions.

The choice of supplier or business partner cannot be made by a person in a close relationship with the service or product provider. In our relations with our clients or competitors we avoid situations that may cause a conflict between the employee's personal interest and the company's interests.

Possible social relations of our employees with employees of our clients or competitors should not affect the terms of cooperation or the work performed.



WHAT DOES DOING THE RIGHT THING MEAN?



WHAT SHOULD WE DO WHEN DOUBTS ARISE?

We all have a slightly different definition of doing the right thing. What may seem right to one person may not matter so much for another person.

If any of us find ourselves in a situation where we are asked to do something that may be against the rules or suspects another employee or a third party of unethical behaviour, ask yourself three questions:

- » Does it go against my moral or ethical principles?
- » Will most people feel the same way about this?
- » Is this inconsistent with our Code of Conduct?

If, after asking yourself these questions, you still feel insecure, there is a high probability that our Code of Conduct has been violated. First of all, you should ask your direct superior or the legal and HR teams for advice. If after obtaining their advice, all doubts regarding the report have been dispelled, you should not hesitate and report the matter. It is in the interest of all of us. You can do it in all the places mentioned earlier or by sending an e-mail to:

kodekspostepowania@plast-box.com

Any reported doubts will always be treated as confidential, and we guarantee full anonymity and protection against any kind of repercussions or harassment.

STATEMENT

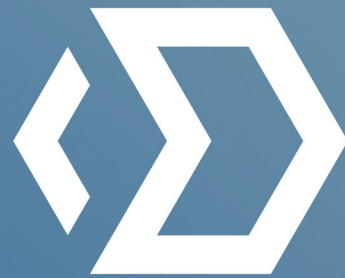
I HAVE RECEIVED A COPY OF THIS CODE OF CONDUCT AND AGREE TO ABIDE BY IT.



First and last name:

Date:

Signature:



 **PLAST BOX**
Packaging Group

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