



CODE OF CONDUCT

OF PTS PLAST - BOX S.A. / STARK PARTNER SP. Z O.O.
/ KARTPOL GROUP SP. Z O.O. / SUWARY
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CONTENTS



About us	3-4
Who does the Code apply to?	5
Applying the Code in practice	6
Our values and business relationships	7
Mutual treatment	8
Health and safety of the working environment	9
Freedom of association and collective bargaining	10
Working conditions and child labour	11
Modern slavery	12
Environmental Protection	13
Sustainable Development	14-15
Cooperation with suppliers	16
Combating corruption and bribery conflicts of interest	17
What does doing the right thing mean? What should we do when doubts arise?	18
Statement	19



ABOUT US



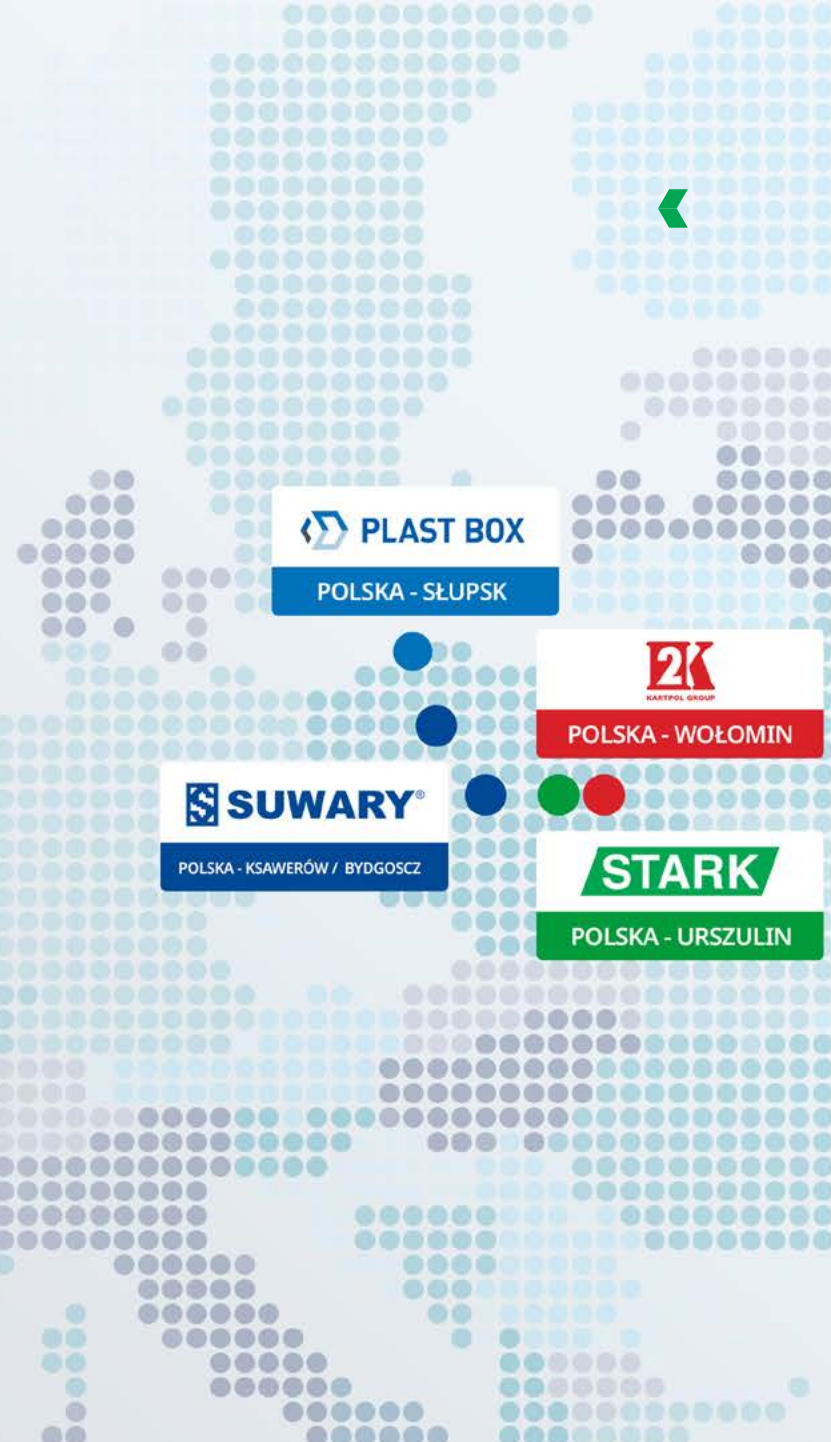
PTS Plast-Box S.A. is one of the most modern companies in Europe involved in the production of plastic buckets. We have been operating since 1983. Stark Partner Sp. z o.o. was founded almost 3 decades ago and focuses on packaging for the food industry. In 2018, it was acquired by PTS Plast-Box S.A. In 2022, the Suwary Group, whose first factory was established back in 1950, was acquired. The plant in Ksawerów has offered a wide range of blow-moulded bottles, canisters, and watering cans since the 1990s. The plant in Bydgoszcz carries out orders under the contract manufacturing formula. Kartpol Group Sp. Z o.o., founded in 1996, specialises in cartridge-type packaging for silicones, acrylics, etc. During this time, we have undergone a dynamic transformation from a small family business to a modern group with a European focus.

The key document that describes the objectives and direction of our activities is the Integrated Management System Policy. Based on the policy, we conduct our business activities with ethical, social, and environmental responsibility in mind. Our Code of Conduct stems from this document and extends its scope and details key provisions based on expectations set by the market.

ABOUT US

The growth strategy of all the companies is based on a balance between the pursuit of economic success and care for positive relationships with employees, contractors, and partners, as well as concern for the local communities in which we operate and the environment that surrounds us. Applying the principles of sustainable development is essential to our success, whether in business, social, or environmental terms, which is why we consistently strive to implement its various elements on a daily basis.

In order to make our initiatives and actions in this area effective, we have established a Sustainability Team, whose primary task is to identify and take action to implement the requirements of the law and other sustainability requirements, and to communicate information to employees and relevant stakeholders related to the implementation of tasks arising from the requirements of sustainable development and responsible business.





WHO DOES THE CODE APPLY TO?

This Code of Conduct 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, employees (permanent, fixed-term, temporary), subcontractors, apprentices, seconded staff, homeworkers, seasonal and temporary staff, volunteers, and interns.

By third party, we mean all suppliers, service providers, agents, business partners, external consultants, charities, advisers, or entities working 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 that their employees and subcontractors behave in accordance with the provisions of the Code when trading 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 relations on values such as transparency, honesty and trust, and the key to our success is our continuous quality improvement and customer service, focused on responding quickly to our clients' needs and requirements. We place great importance on where our products and raw materials come from and require that they are sourced in an ethical and legal manner.

Our suppliers are selected based on factors such as quality, service, price, sustainability, and delivery. We audit high-risk suppliers and work with them to continually improve standards and make sure that the human rights of workers in the supply chain are respected.

We will always act towards each other and our business partners, including clients and suppliers, in a fair, equitable manner, with respect for human rights.

We believe that the principle of fair competition is a fundamental legal and economic rule that enables market rivalry while respecting good business practices and the interests of other market participants, and eliminating discriminatory actions. Further details are set out in our [Fair Competition Policy](#).





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 adhere to high standards, respect human rights, and take appropriate steps to protect employees from 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 our people, which is why we make every effort to provide employees with the right working conditions, a friendly atmosphere full of mutual respect and understanding, and opportunities for their development.

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

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

Our [Diversity Policy](#) and [Human Rights Policy](#) describe in greater detail the principles guiding our interactions with one another.

HEALTH

AND SAFETY IN THE WORKING ENVIRONMENT

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

We ensure that the quality of the final factors (lighting, noise, microclimate), chemical factors (e.g. paints, industrial solvents), and biological factors (viruses, bacteria) found both in the workplace and in the workplace environment are properly maintained. Appropriate tools and control processes are used for this purpose. We continuously improve the quality of working conditions and identify hazards 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 employee initiatives to implement alternative methods to meet our employees' demands and interests.

We follow the rules of fair negotiations, and 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 relations.

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

Further details can be found in the [Human Rights Policy](#) available [here](#).



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 competencies to the assigned tasks. Respect for dignity is ensured with the simultaneous lack of acceptance of 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 in force in our territory regarding personnel; thus, we do not employ or use children in any activities.

Further details can be found in the [Human Rights Policy available here](#).



MODERN SLAVERY

We strongly disassociate ourselves from the use of, and in no way tolerate any form of modern slavery, serfdom, forced labour or human trafficking within the scope of our activities or in our supply chain. Our group's management promotes transparency, ethical behaviour and a commitment to compliance with laws against slavery and human trafficking, including modern slavery (such as debt bondage, international child trafficking, and forced labour of prisoners in labour camps).

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

Further details can be found in the [Human Rights Policy available here](#).



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 to 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.

To highlight the importance of environmental protection efforts, we have compiled our key principles in the [Environmental Policy](#).

SUSTAINABLE DEVELOPMENT

We all need the right environment to work in and a place to live in. We strive to create a group that is environmentally friendly, ethical and sustainable in its actions.

Our Sustainability Team defines the plans and tasks to meet the legal and other requirements in the field of sustainable development. At the same time, it communicates to employees and 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 cars in transport, and their mileage to reduce CO2 emissions into the atmosphere.

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

In line with the closed loop philosophy, at Słupsk all the materials used to produce packaging are 100% recyclable. 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.





SUSTAINABLE DEVELOPMENT

We continue to increase the share of secondary raw material (PCR), purchased externally and used in our packaging. In Urszulin and Wołomin, we recycle production waste that is suitable for processing and can be used to produce packaging in a closed loop.

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 reduce the cutting down of trees.

We focus on the education of producers and consumers, carrying out pro-social and pro-environmental activities as early as the primary school stage, for example, through special lessons on ecology and recycling.

In our work, an important point of reference is the expectations of our neighbours and conducting our business in such a way that our relationship with the environment is 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 halls.

We are constantly increasing our share of energy from renewable sources. We have installed photovoltaic panels at the production facilities in Słupsk, and they will 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 to hybrid and electric 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.





COOPERATION WITH SUPPLIERS

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

We place great importance on where the raw materials for our products come from and require that they are sourced legally and ethically. Suppliers must ensure that their production facilities and workplaces meet our requirements with regard to respecting human rights, ensuring sound employment conditions and caring for the environment.

We audit high-risk suppliers and work with them to continually improve standards and make sure that the human rights of workers in the supply chain are respected.

FIGHTING CORRUPTION AND BRIBERY

CONFLICTS OF INTEREST



All persons working in the group are obliged to avoid relationships and circumstances that could create ethically questionable situations. Invitations must be within the 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 the violation of such a prohibition as gross misconduct. We only accept forms of hospitality or gifts from our clients if this is in accordance with the tax and legal regulations applicable in the country concerned and does not create the impression of an attempt 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 could create a conflict between the employee's personal interests and those of our company. Possible social relations between our employees and employees of our clients or competitors should not affect the terms of cooperation or the work performed.

Operational transparency and business integrity are the foundations of our business operations. We outline the key aspects of this area in our [Anti-Corruption Policy](#).



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 have quite the opposite meaning to another.

If any of us find ourselves in a situation where we are asked to do something that may be against our policy or suspect another employee or third party of unethical behaviour, then we should ask ourselves 3 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 to report the matter. This is in everyone's interest. You can do it in all the places mentioned earlier or by sending an email 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:

