



**United Nations**  
Global Compact



 **Logoplaste**

UNITED NATIONS  
GLOBAL COMPACT

**10 PRINCIPLES**

**COMMUNICATION  
ON PROGRESS 2019**

PERIOD COVERED BY OUR COMMUNICATION ON PROGRESS  
From August 2018 to August 2019

# MESSAGE FROM THE CEO

August 13th, 2019

To our stakeholders:

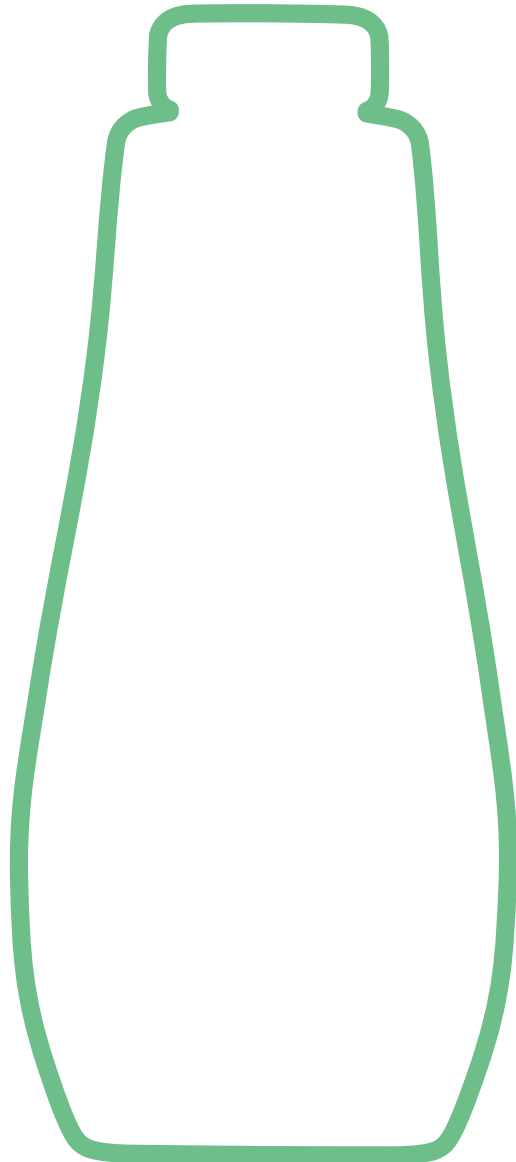
I am pleased to confirm that Logoplaste reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this first annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our main channels of communication.

Sincerely yours,



**Gerardo Chiaia**  
Logoplaste CEO



# LOGOPLASTE'S VISION AND CORE VALUES

Logoplaste's **Vision** is to be the natural choice in the supply of rigid plastic packaging, delivering end-to-end solutions in a Sustainable and Partnership manner.

In everything we do, and everywhere we operate around the world, Logoplaste has a set of well-defined **Core Values**, with Sustainability at the center:

**Our Core Values** are reference points for all our actions and decisions. **Our Core Values** guide us in our relations with internal and external contacts.



# LOGOPLASTE'S SUSTAINABILITY PILLARS



Logoplaste's **Commitments** towards each pillar are:

## PEOPLE & COMMUNITY

- Zero Tolerance towards discrimination, harassment, child labour and any form of forced labour
- Assuring the highest Ethical Behaviour from Everyone at Logoplaste
- Promotion of a Safety Culture and responsible workplace, aiming to Zero Accidents
- Attract, Engage, Develop, Retain and Care for our Employees, so They feel at Home
- Being Part of and Supporting the Communities in which we are Privileged to operate in

## ENVIRONMENT & ECONOMY

- To be THE Business Partner of choice
- Continue to invest on our Pioneering Business Model of Wall-to-Wall (W2W) plants, delivering nil CO2 Emissions on bottle logistics
- Work with Business Partners that share the same Ethical Values and Principles
- Use strategic Supply Chain Partnerships to build a Circular Economy by:
  - Developing packaging solutions that are fully recyclable or reusable by 2025
  - Increasing the incorporation of recycled materials in all our packaging by 2025
  - Driving recycling activities and technologies
- Reduce GHG Emissions and Operational Waste across all Logoplaste plants
- Continue to promote a conscious and efficient use of Water

## INNOVATION

- Work together with our Partners to implement Light-weight packaging programs
- Integrate Biomimicry Thinking – Innovation inspired by Nature – to design end-to-end effective sustainable packaging solutions
- Innovate, Advise and Support our Partners to provide packaging that incorporates recycled and/or renewable raw materials
- Develop Upstream channels that can Underpin Both Our Partners and Logoplaste Sustainability commitments

*"If you want to go fast, go alone. If you want to go far, go together."*

**African Proverb**

*"We don't have to sacrifice a strong economy for a healthy environment."*

**Dennis Weaver**

*"Innovation distinguishes between a leader and a follower."*

**Steve Jobs**

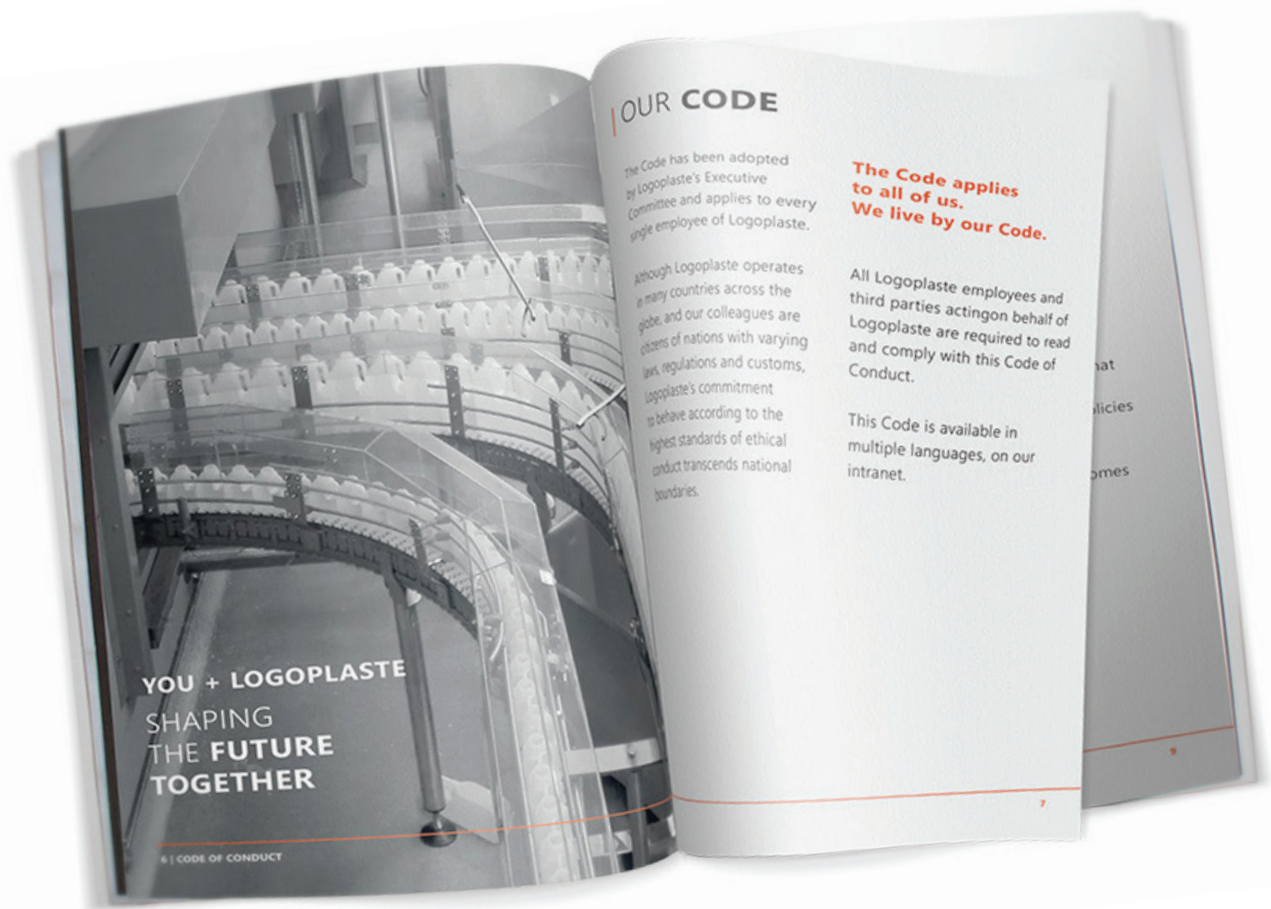
# LOGOPLASTE'S CODES

Logoplaste Group has a Global Code of Conduct that applies to every single employee of Logoplaste: all Logoplaste employees, and third parties acting on behalf of Logoplaste, are required to read and comply with the Logoplaste Global Code of Conduct.

Although Logoplaste operates in many countries across the globe, and our colleagues are citizens of nations with varying laws, regulations and customs, Logoplaste's commitment to behave according to the highest stan-

dards of ethical conduct transcends national boundaries. Compliance with the Code of Conduct is a term and condition of employment with Logoplaste.

Logoplaste has also a Global Code of Conduct for Suppliers and Contractors as Logoplaste intends to work only with suppliers who share an essential set of values and principles in the area of Business Ethics, Human Rights and Labour Practices, Occupational Safety and Health and Environmental Responsibility.







# HUMAN RIGHTS

## PRINCIPLE 1

Logoplaste supports and respects the protection of internationally proclaimed human rights; and

## PRINCIPLE 2

Logoplaste makes sure that it is not complicit in human rights abuses.

As stated in our Global Labour Practices and Human Rights Policy, Logoplaste supports and respects the principles proclaimed in the Universal Declaration of Human Rights and believes businesses should ensure that they are not complicit in human rights abuses.

Logoplaste Global Labour Practices and Human Rights Policy outlines standards to ensure that all Logoplaste employees are treated with respect and dignity, are

working under their own free will, and are being properly compensated for their effort.

Logoplaste recognizes the responsibility to respect employees' human rights and demonstrate that we act accordingly. The Logoplaste Global Labour Practices and Human Rights Policy is aimed at supporting and guiding our management and employees to achieve this goal.

Logoplaste is committed to ensuring that we are not complicit in any human rights violations and hold our suppliers and partners/clients the same high standard.

Logoplaste recognizes that in countries that are politically less stable, or where human rights are compromised, dilemmas may arise, including whether or how it can continue to operate in that country with integrity. Logoplaste will act in such a way that none of its operations knowingly contribute to human rights violations by others.

Through our Global Code of Conduct, Logoplaste commits to:

- Act in full compliance with the existing legislation and regulations in the countries where it operates, promoting dignified labour conditions.
- Provide a safe, healthy and hygienic workplace environment, taking effective precautions to prevent potential health & safety incidents, occupational injury or illness, associated with or occurring in the course of work. Logoplaste will minimise or eliminate so far as is reasonably practicable, the causes of all material hazards in the workplace environment;
- Respect and promote respect for employees, ensuring decent work conditions, not engaging in or tolerating the use of corporal punishment, mental or physical coercion or verbal abuse of employees;
- Prohibiting employees from engaging in any behaviour that is threatening, abusive, exploitative or sexually coercive, including inappropriate gestures, language and physical contact in the workplace.

Logoplaste has a Global Employee Grievance (Whistleblow) Policy and mechanisms for doing so. No employee shall be subjected to discrimination or adverse treatment for participating in a grievance procedure. Logoplaste provides a wide variety of mechanisms to help employees address issues and concerns, including SpeakUp Channels managed by an external company, available 24/7, free and confidential.

To date no cases of human rights violations have been reported.

Logoplaste's suppliers and contractors shall pledge to support fundamental human rights, guaranteeing that their workers have the full enjoyment of all the rights and duties set forth in national legislation and international conventions (including temporary workers and interns, migrants, vulnerable groups or other groups), through the signature our Global Code of Conduct for Suppliers and Contractor.

Logoplaste's suppliers and contractors shall commit to treat their workers with dignity and respect, not tolerating acts of violence (physical or psychological), harassment or coercion – such as insults, threats, isolation, invasion of privacy or professional limitation – aimed at constraining a person, affecting his/her dignity or creating a hostile, humiliating or destabilising environment.

As described in our Global Quality, Environment and Health and Safety Policy, at Logoplaste, we promote a health and safety culture founded on authenticity, empowerment and accountability by ensuring high standards of health and safety management throughout all operations. Our vision is to operate with health and safety as a core VALUE, not just a priority - we are committed to the prevention of injury and ill health and believe that working safely is non-negotiable and no task is so important that it cannot be done safely.

Logoplaste takes several actions and measures to ensure a healthy and safe environment:

- All our operational sites have conducted health and safety risk assessments and all the plants have a person responsible for health and safety matters.
- There are procedures in place to anticipate health and safety risks related to start-up of new operations or change of operations.
- We provide protective equipment to all impacted employees, have mandatory health check-ups for all Logoplaste employees and take preventive measures for stress and noise.
- All Logoplaste plants have specific procedures for handling of chemicals or hazardous substances.
- We perform regular inspections to ensure safety of machines/equipment and have maintenance plans in place for all machines/equipment.
- We provide training on health and safety risks and good working practices not only to all our employees but also for contractors working on our premises and we keep records of the trainings.

We record all the accidents and injury types (including first aid). As part of being proactive we also keep track of the near misses and risk assessments performed. A Global Health and Safety Report is issued every month, with detailed information on number of accidents per plant, type of injuries, number of lost hours, the total recordable incidence rate (TRIR) by plant and at group level and number of near misses and risk assessments performed by plant.







# LABOUR

## PRINCIPLE 3

Logoplaste upholds the freedom of association and the effective recognition of the right to collective bargaining;

## PRINCIPLE 4

Logoplaste upholds the elimination of all forms of forced and compulsory labour;

## PRINCIPLE 5

Logoplaste upholds the effective abolition of child labour; and

## PRINCIPLE 6

Logoplaste upholds the elimination of discrimination in respect of employment and occupation.

As stated in our Code of Conduct, Logoplaste commits to act in full compliance with the existing legislation and

regulations in the countries where it operates, promoting dignified labour conditions.

As stated in our Global Labour Practices and Human Rights Policy, Logoplaste endorses the principles enshrined within the Core or Fundamental Conventions of the International Labour Organization.

Logoplaste expects its employees to treat each other with dignity and mutual respect. Employees are responsible for complying with all of Logoplaste's policies, procedures and code of conduct.

In the Global Code of Conduct, Logoplaste commits to:

- Provide its employees with a contractual relation, recognised and defined according to local legislation and regulations. The labour relation cannot be forced or under the threat of any penalty which the employee has not accepted voluntarily;

- Not engage in the use of child labour or forced labour, not to agree to the use of these practices by third parties supplying products or providing services to Logoplaste;

- Respect the freedom of association and to recognise the right to collective bargaining, providing parallel resources for free and independent association. Ensure that union members and representatives of workers are not subject to discrimination, and that such representatives have reasonable access to their members in the workplace;

- Guide labour policies and procedures - hiring, remuneration, access to training, promotion, termination or retirement – in order not to engage in or support discrimination based on race, social origin, gender, sexual orientation, marital status, age, disability, political opinions or union membership;

- Ensure the well-being and development of the employees, providing decent salaries and benefits, that should always meet at least legal or industry minimum standards, or collective bargaining agreements adopted in each country Logoplaste operates in;

- Respect the working days of its employees, complying with applicable laws, collective bargaining agreements and industry standards adopted in each country where Logoplaste operates, in order to protect its employees – maximum working hours per week, overtime, breaks, holidays and maternity and paternity leave. All overtime work shall be voluntary, responsible and in compliance with Logoplaste's business needs, respecting the daily, weekly and annual limits adopted in each country where Logoplaste operates.

Our Global Labour Practices and Human Rights Policy outlines:

### **FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING**

Logoplaste respects the right of its employees to be represented in order to advance their legitimate interests. This right includes the right of internal and/or external employee representatives to be acknowledged as partners in negotiations and consultations subject to local laws.

There are formal country collective agreements in Brazil, France, Portugal, Spain and Italy which cover around 45% of our total workforce. There are country works council in place in our plants in Poland, Netherlands and in our plant Logoplaste Santa Iria in Portugal, represent-

ing around 8% of our total workforce.

### **FORCED LABOUR**

Logoplaste will not engage in or support the use of forced or compulsory labour – such as prison labour, debt bondage, trafficking or serfdom.

Logoplaste will avoid working with suppliers or employment agencies that are known to be making use of forced or compulsory labour in their operation.

### **CHILD LABOUR**

Logoplaste respects the rights of the child, including the right to education, the right to rest and play and the right to have the child's basic needs met.

Logoplaste will therefore not engage in or support the use of child labour, which means that Logoplaste will not allow children to work within its facilities.

### **NON-DISCRIMINATION**

In relation to the appointment or career prospects of employees, Logoplaste will pay attention only to the suitability of the candidate (education, personality, skills, working experience, and other relevant attributes as allowed under local law) and his or her legitimate demands.

Logoplaste will take its decisions regarding present and future employees on the basis of objective criteria.

Logoplaste respects cultural and individual diversity and promotes inclusiveness. It respects personal beliefs / persuasions of employees.

Logoplaste has a Global Recruitment Policy to ensure recruitment is fair and consistent. Logoplaste aims at all times to recruit the person who is most suited to the particular job. Recruitment will be solely on the basis of the applicant's abilities and individual merit as measured against the criteria for the job. Qualifications, experience and skills will be assessed at the level that is relevant to the job.

Logoplaste is committed to applying its equal opportunities policy at all stages of recruitment and selection. Shortlisting, interviewing and selection will always be carried out without regard to gender, sexual orientation, marital status, colour, race, nationality, ethnic or national origins, religion, belief or age.

Furthermore, any candidate with a disability will not be excluded unless it is clear that the candidate does not



meet the minimum criteria outlined in the employee specification. Reasonable adjustments to the recruitment process will be made to ensure that no applicant is disadvantaged because of his/her disability. Job advertisements are posted internally wherever possible and Logoplaste encourages its employees to apply for new positions within the company and promotes mobility of its employees.

Logoplaste compensates its employees for extra or atypical working hours and Logoplaste has an Employee Assignment Allowance Policy, designed to compensate Logoplaste employees that are required to work away from home in roles that are outside of their usual place of work or region.

As Logoplaste believes it is important that employees are treated fairly and receive prompt responses to problems and concerns that may arise in the workplace, Logoplaste has a Global Employee Grievance Policy and

mechanisms for doing so. No employee shall be subjected to discrimination or adverse treatment for participating in a grievance procedure.

Logoplaste provides a wide variety of mechanisms to help employees address issues and concerns, including SpeakUp Channels (Whistleblow) managed by an external company, available 24/7, free and confidential.

To date there has been no grievances reported on child labour, forced labour, discrimination, harassment nor other violation of human rights and labour practices. There are no employees below 18 years old.

As at Logoplaste, our team is our most valuable resource, we are committed to providing our employees not only with fair remuneration and a safe working environment but also with professional fulfilment, development, training and recognition.

Logoplaste is committed to the training and develop-



ment of all employees, at all levels: we believe that all employees have the potential to grow, both in their work role and at a personal level and shall endeavour to provide opportunities for this growth.

Logoplaste has established a Performance Management System, to identify key individuals and reward, train, develop and promote our employees based on their merit and ability.

Logoplaste promotes interactive communication sessions with employees, through the Focus Groups, regarding working conditions and employee's interests and preferences. Focus Groups are group interviews, where a facilitator ((plant manager or HR) guides the interview while a small group discusses the topics raised. Every employee should be invited and participation in voluntary.

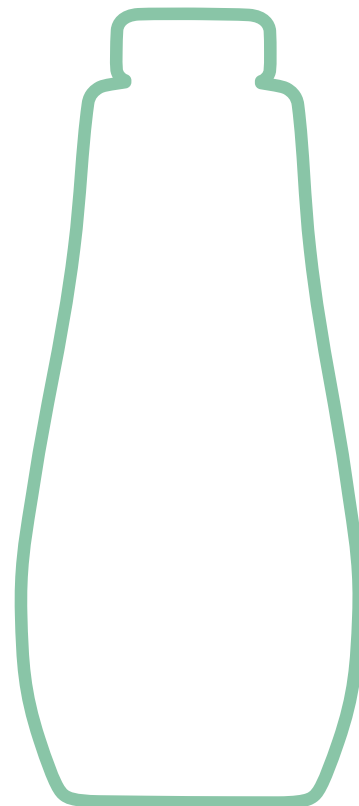
On a regular basis Logoplaste performs an Employee Climate Survey, to understand the views of its employees and their general satisfaction level and assess leadership and management practices that contribute to performance. The survey assesses seven major areas: personal development, pride and fulfilment, communication, compensation, work life balance, training and safety and fairness. All countries and employees are covered by the Employee Climate Survey and the answers are confidential and anonymous.

As set in Logoplaste's Global Code of Conduct for Suppliers and Contractors, Logoplaste's suppliers/contractors are expected:

- To respect the legislation, regulations, rules and requirements applicable to the company in matters of labour code.
- To not employ child labour or forced labour, nor condone such practices by third parties who supply them with products or provide services for them. When minors are employed, all legislation and regulations applicable to child labour shall be complied with.
- To not discriminate in practices related to hiring, employment, access to training, career advancement or any other working condition, so that all workers enjoy equal opportunities and treatment, regardless of their ethnic origin, race, nationality, age, gender, religion, sexual orientation, physical abilities, political

convictions and/or association to trade union or other collective bargaining.

- To respect the freedom of trade union membership and recognise the right to collective bargaining.
- To respect the employees', work day, guaranteeing compliance with legislation, regulations and collective bargaining of the sector in each country where they operate, so as to protect their employees – the maximum number of weekly work hours, overtime work, rest periods, holidays, parental leave.
- All overtime hours shall be performed, responsibly and in line with the needs of the company's activity, respecting the daily, weekly and annual limits set forth in local legislation.
- To seek the well-being and development of their employees, beyond decent salaries and benefits, in accordance with the standards adopted by each country where they operate.





# ENVIRONMENT

## PRINCIPLE 7

Logoplaste supports a precautionary approach to environmental challenges;

## PRINCIPLE 8

Logoplaste undertakes initiatives to promote greater environmental responsibility; and

## PRINCIPLE 9

Logoplaste encourages the development and diffusion of environmentally friendly technologies.

Logoplaste has a Global Quality, Environment and Health and Safety Policy: we are committed to creating environmentally responsible operations and products by continually improving the efficiency of our resources, consumption of raw materials, energy, water, preventing and minimising emissions and discharges from our op-

erations and targeting zero waste to the environment. We are committed to continuously reviewing and improving our environmental practices and performance to progress towards our vision. Technology plays an essential role in our practices, and via energy assessments, we shall aim to work with equipment manufacturers to improve environmental performance.

Our 3 years Environmental plan targets:

- Energy: to identify the energy rating of all plant equipment such as lighting, motors, compressors, chillers, ovens and to maintain a live inventory.
- Operation Clean Sweep: to minimise the risk of marine pollution from polymer pellet or flake lost.
- Control of Waste: segregate and ensure correct disposal of plant waste by category to enable it to be recycled by a 3rd party (cardboard, paper, plastic) or used for energy recovery.



Logoplaste has also a Global Water Policy: although Logoplaste's operations are not water intensive – water is mainly used for cooling purposes in a closed-loop, cleaning activities and welfare - we should continuously monitor and take actions to reduce the amount of water we use and manage it responsibly in our operations, even where water is currently plentiful.

The Global Water Policy aims at:

- Ensure compliance with environmental laws and regulations, this is non-negotiable
- Always guarantee the provision of fully-functioning, safely managed WASH (WAter, Sanitation and Hygiene) services to all employees
- Responsible use of water, including monitoring of water withdrawal with a focus on reduction of water
- Systematic reporting and tracking of water-related risks to the company and local communities
- Monitor our water usage and discharge, as well as the potential effects on the surrounding environment, to improve performance
- Regular increase in water recycles and reuses
- Manage and reduce effluents
- Initiate incident investigation and corrective action whenever needed, and report on non-compliance

Logoplaste takes several actions and measures in order to create environmentally responsible operations and products:

- Logoplaste operates a wall-to-wall (W2W) business model. In this business concept, our on-site facilities are fully integrated within our customer's premises, supplying "just-in-time" plastic packaging and by so doing, removing the need of secondary packaging and all logistics associated with transport and delivery of empty bottles, avoiding CO<sub>2</sub> emissions.
- Employee's awareness programs focused on reduction of energy and water consumption. For this purpose, Logoplaste uses, among other communication tools, Logoplaste's intranet, the LogoTV's, "Have you Heard" e-mails, skype training and "message" posters strategically placed.
- As energy is one our main sources of direct GHG emissions, Logoplaste selects low energy consumption machines/equipment/technologies when building a new plant or when acquiring new equipment/machines.

- Manufacturing sites are built, and machines/equipment are chosen taking in consideration several other requirements including dust/particle emissions, the noise level and its impact on employees and surrounding areas.

- All machines/equipment/buildings have maintenance plans in order to guarantee they are kept in the best conditions and therefore minimizing the noise level. The machines/equipment used for our type of industry/product don't originate external discharge of dust/particles.

- All Logoplaste plants have procedures in place for labelling, storing, handling and transporting hazardous goods and chemicals and response procedures in place for emergencies, like oil spills.

- As recycling of plastics does not begin with collection but rather with the design of products. (products should be designed so they don't hamper recycling), Logoplaste uses design for recycling, innovative design tools like biomimicry thinking – Innovation inspired by Nature – and proprietary software to improve the environmental profile of packaging.

- Logoplaste implements whenever possible lightweight / "rightweight" programs that reduce the weight of the packages, maintaining the mechanical performance and reducing the CO<sub>2</sub>.

- Logoplaste uses raw materials with established recycling streams: The main raw materials used in production are PET and HDPE and these materials have well established recycling streams.

- Logoplaste develops packaging to raise awareness for the ocean plastic contamination problem, like the Ecover Ocean bottle, Fairy Ocean bottle and OceanBound Windex bottle. Ecover Ocean bottle was the first ever bottle made from ocean waste plastic.

- Logoplaste works together with its customers to incorporate recycled raw materials in their products in a correct and balanced way. The technologies and equipment used by Logoplaste sites allow to accommodate up to 100% recycled content with minor modifications and investment.

- Logoplaste designs and produces reusable packaging, when applicable. The EPAL and Vimágua reusable water

bottles were created to promote the consumption of tap water everywhere and not just indoors.

- Logoplaste engages with key actors in the supply chain to develop, evaluate and validate new and/or alternative raw materials and recycling technologies. For example, Logoplaste belongs to the advisory board of DEMETO project – chemical recycling process using microwave depolymerization. This chemical recycling will make part of the recycling chain (closing the loop and then contributing to a circular economy) and will be used for the opaque PET stream. The pilot plant is being finalized and test of full-scale plant is expected to happen in 2020.

- Logoplaste supports the implementation of Deposit Return Systems (DRS) for single-use plastic drinks bottles in the countries where Logoplaste operates, as these systems have proven to achieve high collection and low feedstock contamination.

- Logoplaste signed the New Plastics Economy Global Commitments common vision led by the Ellen MacArthur Foundation and made the following individual commitments:

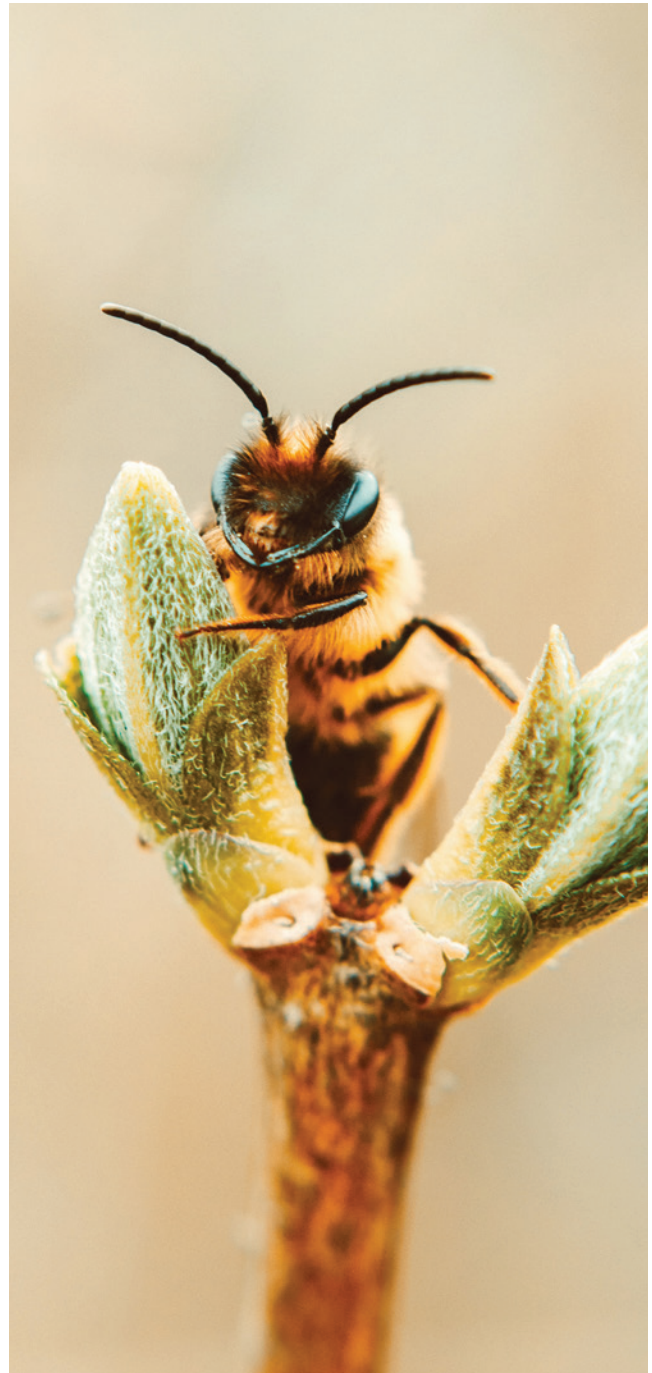
- Take actions to eliminate problematic or unnecessary plastic packaging by 2025
- Take actions to move from single-use towards reuse models, where relevant, by 2025
- 100% of plastic packaging to be reusable or recyclable by 2025
- Continue to grow the use of recycled content across all packaging we produce
- Achieve or exceed the legal requirement on the use of post-consumer recycled content, working hand-in-hand with our Industrial Partners.

As stated in Logoplaste's Global Code of Conduct for Suppliers and Contractors, Logoplaste's suppliers/contractors shall comply with all legislation/regulations applicable to them in matters of environment and take steps/actions that have in view the continuous improvement of the Environmental Performance of their company:

- To use natural resources responsibly, promoting energy efficiency and waste reduction.
- To minimise environmental impacts arising from their activities.
- To promote the reuse and recycling of wastes generated, guaranteeing an appropriate final destination

for them, through operators licenced for that purpose.

- To correctly control waste arising from activities on their premises as well as Logoplaste, all waste shall be managed using approved waste management companies with appropriate records maintained.





## ANTI-CORRUPTION

### PRINCIPLE 10

Logoplaste works against corruption in all its forms, including extortion and bribery.

Logoplaste has a Global Code of Conduct, an Anti-Bribery and Anti-Corruption Policy, an Anti-Money Laundering Policy and a Global Code of Conduct for Suppliers and Contractors that address principle 10.

Prior to joining Logoplaste, we require that new employees certify (in a form), that they have read and fully understood the Code of Conduct, the Anti-Bribery and Anti-Corruption Compliance Policy and the Anti-Money Laundering Policy, and that they will comply with it and will report suspected violations.

New employees must attend orientation sessions where they will be briefed on, among other things, the Code of Conduct, the Anti-Bribery and Anti-Corruption Compliance Policy and the Anti-Money Laundering Policy, as

part of the Induction Program, shortly after they begin work.

Thereafter, all employees are required to complete additional annual training on these policies and must re-certify to their understanding and ongoing compliance. Compliance with these requirements is a condition of employment.

### OUR CODE OF CONDUCT - OUR ETHICS

Logoplaste is committed to conduct itself by our values and principles, in our operations and business, always recognizing our obligations to all those with whom we have dealings.

Logoplaste's reputation, as well as the trust and respect of those we do business with, are extremely important. Logoplaste maintains and demands the highest ethical standards in the development of its business.

### COMPLIANCE WITH LAWS AND REGULATIONS

Logoplaste, as a global company, is committed to re-

spect the laws, regulations and comply with all applicable business requirements where we operate. Logoplaste and its employees are bound by the law. Compliance with all applicable laws and regulations must never be compromised.

Additionally, employees shall adhere to internal rules and regulations as they apply in each situation. Those internal rules are specific to Logoplaste and may go beyond what is required by the law.

### **CONFLICTS OF INTEREST**

Employees are required to always act in accordance with the highest standards of integrity and to the best interests of Logoplaste.

Conflicts of interest like third-party interests, personal benefits, personal relationships or outside business activities can affect (or could appear to affect) Logoplaste's employee objectivity. Employees are expected to diligently avoid conflicts of interest.

### **INSIDER TRADING**

While performing their duties, employees may find, learn or work with important Logoplaste non-public information, such as sales, earnings, acquisitions, regulatory matters, or other. It is every employee's responsibility to keep non-public information confidential.

### **PROPRIETARY AND CONFIDENTIAL INFORMATION**

Logoplaste values and protects our proprietary and confidential information, and we respect the proprietary and confidential information of others.

Employees shall not disclose confidential information or allow such disclosure. This obligation continues beyond the termination of employment with Logoplaste.

Employees must use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information.

In case any of our competitors, suppliers or customers, share with Logoplaste confidential information, such information shall be treated with the same care as if it was Logoplaste's confidential information.

Employees must not use any illegal or unethical means to obtain information from any competitor, customer or supplier, or disclosure any Logoplaste information.

Proprietary or confidential information must not be shared or discussed outside Logoplaste, except where permitted or required by applicable law or regulation, or order issued by a court of competent jurisdiction or requested by an official agent.

Employees are responsible for ensuring their own compliance with all Logoplaste policies and procedures, including the Logoplaste Global Social Media Policy.

### **FRAUD, PROTECTION OF LOGOPLASTE'S ASSETS, ACCOUNTING**

Logoplaste commits to honesty and respect for our assets and property.

Employees must never be involved in fraudulent or any other dishonest or misleading conduct involving Logoplaste property, assets or financial reporting and accounting.

Logoplaste's financial records are the basis for managing our business and fulfilling our obligations to various stakeholders. Therefore, any financial record must be accurate and in line with Logoplaste's accounting standards.

Employees are responsible for safeguarding tangible and intangible Logoplaste assets, including trademarks, know-how, confidential or proprietary information and information systems.

Employees shall seek to protect Logoplaste's property from loss, damage, misuse, theft, fraud, embezzlement and destruction.

To the extent permitted by applicable law, Logoplaste may monitor, inspect and record how its assets are used by employees, including inspection of all e-mail, data, equipment and files kept on Logoplaste network terminals.

### **ANTI-BRIBERY AND ANTI-CORRUPTION**

Logoplaste condemns and prohibits any form of bribery, corruption or illegal payments.

Employees must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage, in order to obtain or retain a business or other advantage from a third party.

Furthermore, employees must never solicit or accept any advantage in return for any preferential treatment of a third party.

All Logoplaste employees should be conscious that offering or giving of improper benefits, to influence the decision of others, may result in disciplinary measures, up to and including termination and referral to legal authorities if required.

Special caution and attention apply when dealing with Government Officials (Government Official' is defined in the Logoplaste Anti-Bribery and Anti-Corruption Policy). Employees are responsible for complying with all Logoplaste policies and procedures, including the Logoplaste



Global Anti-Bribery and Anti-Corruption Policy.

### **HOSPITALITY - GIFTS, MEALS, TRAVEL AND ENTERTAINMENT**

Logoplaste competes and does business based only on quality and competence.

Employees shall not be influenced by receiving favours, nor shall they try to improperly influence others by providing favours.

Employees may only offer or accept reasonable meals or other hospitality and symbolic gifts which are appropriate under certain circumstances, transparent and appropriate to the business relationship, and recorded properly identifying the recipient name, title, organization, business purpose and date, and all attendees, and any other pertinent data.

Employees shall never accept or offer any hospitality if such behaviour could create the impression of improperly influencing the respective business relationship.

Therefore, employees must follow basic rules, and always comply with the Hospitality guidance provided in the "Anti-Bribery and Anti-Corruption Policy":

When in doubt, the employees shall seek guidance from their Manager, the Human Resources department and/or Global Compliance Officer.

Logoplaste has internal mechanisms to report irregularities or behaviours not in compliance with the principles outlined in Logoplaste Code of Conduct and Logoplaste Global Policies.

We rely on our employees to practice sound decision-making behaviours that preserve an ethical workplace. Employees are responsible for their own decisions. No one, at any level, has the authority to tell an employee to do something unethical or illegal. If an employee is unsure of the proper course of action, he/she must address Human Resources and/or report through defined communication channels (described in the Global Employee Grievance Policy). Information provided to Human Resources is confidential and private, protecting all parties involved.

To date no cases of ethical violations have been reported.

Through our global Code of Conduct for Suppliers and Contractors, we also ask our suppliers/contractors to conduct their business with integrity, honesty and respect for all those with whom they interact:

- To fully comply with the applicable laws and regula-

tions of the countries in which it operates, including competition laws.

- To not damage the reputation of their competitors, directly or through insinuations.
- To respect the confidentiality of confidential information and Logoplaste's intellectual property, using such information only for the purposes authorised by Logoplaste.
- To not offer nor accept any monetary contribution, offer, provision of services or other benefit that may be interpreted as an attempt to influence the result of a business decision.
- To combat corruption, specifically, bribery, embezzlement, extortion or other forms of corruption in their relations with third parties.
- To not use any illegal or anti-ethical means to obtain information from any competitor, customer or supplier or divulge any Logoplaste information.

