

# CODE OF CONDUCT

## ELPLAST EUROPE SP. Z O.O.

### PREAMBLE

As a manufacturer of EL-ZIP® press to Close zipper closures Elplast Europe Sp. z o. o. has been active on the markets of over 60 countries all over the world for longer than 30 years. High quality and a wide range of products put us at the Forefront of zipper closure manufacturers what additionally motivates us to improve continuously in all areas of our business.

Representing the highest standards of global business, we want to be viewed as a Company of clear and homogeneous business profile and high awareness of corporate social responsibility.

We are committed to manufacturing the high quality products in compliance with the stringent safety requirements that represent simultaneously our sense of social responsibility, concern for people and the environment.

Our priority is to place high demands on us and on our suppliers.

The present Code of Conduct reflects our involvement in social responsibility, our concerns for the highest level of safety and our great sense of responsibility to respect human rights.

Our basic ethical objective is to be a responsible social activist at every stage of Company's activity.

## HEALTH, SAFETY AND THE ENVIRONMENT

### WORKING CONDITIONS:

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Provision of safe working conditions for employees is an inviolable principle that determines Elplast Europe's activity. At every stage of work we plan all activities so as to comply with the safety regulations and to provide decent working conditions for all our employees.

### TRAININGS:

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Our constant objective is to raise our staff's awareness and skills through trainings provided for our employees. Starting his/her work, each employee of Elplast Europe Sp. z o. o. is provided with the initial training package covering the occupational safety regulations, on-the-job training, Integrated Management System training, that enables our employees to perform their duties safely and professionally and to deal with any fire hazards. Periodic trainings covering the OSH aspects and trainings to enhance the employee's professional skills are organized several times a year.

### ENVIRONMENTAL:

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In its activity Elplast Europe Sp. z o. o. complies with all locally applicable environmental regulations including protection of water, air and soil, reduction of the noise emission and prevention of accidents. We monitor any amendments to the acts, regulations and EU directives on a current basis. We are committed to ensuring and improving the environmental standards including waste products limitation and efficient water and Energy management. We raise the employees' awareness of the environmental matters through periodic environmental trainings, information boards and the monthly record and assessment of the generated waste volume.

## EMPLOYMENT OF MINORS

In Elplast Europe Sp. z o. o. employment of minors is not allowed. We do not engage in business with any entities that do not obey these principles, either. All Elplast Europe's employees or candidates who want to be employed by Elplast Europe Sp. z o. o. must be at least 18 years old.

Additionally we try to create favorable conditions to enable young people to launch their professional career in our Company.

It is permissible to employ juvenile workers for the purpose of vocational training or apprenticeship in accordance with the applicable provisions of the Labor Code.

## PAY

The Elplast Europe's employees are guaranteed fair rates of pay in accordance with all locally applicable legislations regulating salaries, allowances and benefits.

The Company complies with all principles arising from the binding regulations on hours of work, overtime and the benefit paid.

## FREEDOM OF ASSOCIATION

Elplast Europe Sp. z o. o. respects its employees' right to form and join trade unions and to negotiate in a lawful and peaceful manner in accordance with the applicable legislation.

## RESPECT FOR THE INDIVIDUAL

Our Company conducts its business in a manner that recognizes the entitlement of all individuals to be treated with dignity and respect and in accordance with the principle of equal opportunity. Elplast Europe Sp. z o. o. does not discriminate against employees in any manner on the grounds of gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, sexual orientation, employment for fixed-term or indefinite period, full-time or part-time employment.

Elplast Europe Sp. z o. o. complies with all applicable rules governing disciplinary practices and abuses.

## VOLUNTARY EMPLOYMENT

Elplast Europe Sp. z o. o. employees on a voluntary basis. We use neither prison labour nor slave labour. Neither physical violence nor any form of forced labour may be used in Elplast Europe Sp. z o. o. We do not accept threats or other disciplinary methods aimed at forcing people to work.

## BUSINESS ETHICS

We conduct our business in a highly ethical and honest manner in accordance with all applicable regulations. Elplast Europe Sp. z o. o. does not accept any undue gratuities from local offices or foreign offices, or private sector employees, thus complying with the local law, EU regulations, international standards, directives and conventions.

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Elplast Europe Sp. z o. o. requires also its suppliers to observe the applicable national laws and EU laws, international standards, directives and conventions, and to comply with the provisions of the present Code.

Our Suppliers are informed in detail about the present requirements. We expect our direct Suppliers, in return, to obtain similar compliance with both applicable laws and provisions of the present Code from their Suppliers.

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Observance of all above-mentioned provisions is monitored on a current basis in order to ensure that none of the aforementioned provisions is violated and the business is in full compliance with the ethical requirements.

Marcin Pawelak  
President  
*July 2021*