

# **Jindal Films Europe Brindisi Srl**

## **Ethical Code**

### **"Base Business Policies"**

#### **VISION**

In addition to being profitable, Jindal Films wants to be the world's largest and most innovative flexible packaging producer and our customers' preferred supplier. To accomplish these objectives, we will offer products and services that provide comprehensive solutions to packaging challenges, while providing our customers excellent value. We will also be a good corporate citizen wherever we operate, observing high ethical standards, obeying all applicable laws and respecting local and national cultural standards. Protecting the safety and health of our employees and neighbors will always be one of our highest objectives. We will conduct our activities in an environmentally responsible manner and regularly consider ways to reduce the environmental impacts of our operations. Our products and operations will meet rigorous quality standards.

Jindal Films recognizes that business success requires a dedicated, knowledgeable and motivated workforce. In our workplaces, employees will be valued and empowered. Communications will be open and candid. Effective teamwork and collaboration will be encouraged. Employees will be able to conduct their assigned activities in work environments that are free from harassment and discrimination. Opportunities for employee training and development will be provided. Business decisions will be taken efficiently and will be based on facts.

To help us conduct business in accordance with these objectives, we have adopted a set of base business policies outlining the way we will act. All Jindal Films employees and representatives are expected to comply with these policies.

#### **LEGAL COMPLIANCE AND ETHICS POLICY**

Jindal Films, and all directors, officers and employees, will comply with all applicable governmental laws, rules, and regulations of jurisdictions in which operations occur, including the U.S., European Union and the Asia/Pacific region. We recognize that certain United States laws governing international operations of United States companies and United States persons, broadly defined, may also apply to activities outside the U.S. Such laws may deal with boycotts, trade sanctions, export controls, and foreign corrupt practices

and where they are applicable all Jindal Films directors, officers and employees are expected to comply with them. As a part of this general policy of legal compliance, directors, officers and employees are particularly expected to comply with all applicable antitrust and competition laws of countries relevant to their operations and, if in doubt about the proper interpretation or application of such laws, to seek advice from Jindal Films' legal counsel.

In addition to complying with law, Jindal Films will act ethically in conducting its business. Honesty and integrity are essential in all conduct, whether with other employees, customers or suppliers. The trust generated by such behavior is essential to our business. If circumstances require it, we are willing to lose business in order to maintain high ethical standards.

In their personal activities, directors, officers, and employees are expected to avoid securities transactions based on material, nonpublic information learned through their positions with the business.

The business's books and records will accurately reflect all business transactions. All employees are expected to be honest and forthcoming with management and other employees at all levels and with internal and independent auditors tasked with reviewing and verifying such books and records. The business's internal policies and controls will be followed in all activities.

All reports to government agencies will be full, fair, accurate, and timely, in accordance with the best knowledge of the person(s) preparing them.

## **CONFLICT OF INTEREST POLICY**

All directors, officers, and employees are expected to avoid any conflict between their own personal interests and the interests of Jindal Films. Such conflicts can arise if they take actions or have personal interests that may interfere with the objective and effective performance of their work for the business or if they take for themselves business opportunities discovered through their use of corporate assets or through their positions with the business. Directors, officers, and employees are expected to refrain from competing with the Corporation.

Commercial decisions at Jindal Films will be based on commercial criteria, not on any consideration received by, and benefitting the individuals making those decisions. No one representing Jindal Films will accept gifts or entertainment of more than nominal value from persons doing business with, or seeking to do business with, Jindal. Management will, from time to time, publish guidelines to inform employees of acceptable general limits on gifts and entertainment. Anyone wishing to exchange gifts or entertainment in excess of those limits in connection with Jindal Films business will first submit the proposal to individuals or groups designated by Management for review of such matters. The proposal will be considered in light of pertinent circumstances, including the character of the gift or entertainment, its purpose, its appearance, the positions of the persons providing and receiving the gift or entertainment, the business context, reciprocity, and

applicable laws and social norms, and the proponent will be advised whether the proposed action may be taken.

Officers and employees of Jindal Films may serve as directors of affiliated companies as part of their normal work assignments. They may not, however, accept or hold directorships in nonaffiliated, for-profit organizations if such directorships would involve a conflict of interest with, or interfere with the discharge of the officer's or employee's duties to, Jindal Films. All directorships in nonaffiliated, for-profit and nonprofit organizations are subject to prior review and approval by individuals or groups designated by Management and may be accepted only if the reviewing body determines that there is no likely conflict or interference.

### **PROPRIETARY PROPERTY POLICY**

Directors, officers, and employees of Jindal Films are expected to protect the property of the business. That property includes both tangible and intangible property, such as confidential information. No director, officer, or employee should, either during or after employment or other service, use or disclose confidential information obtained from any source in the course of Jindal Films business unless such use or disclosure is specifically authorized. Examples of confidential information include nonpublic information about business plans, earnings, financial and other business forecasts, discoveries, competitive bids, technologies, and personnel.

### **ANTI-CORRUPTION POLICY**

Directors, officers, employees and third parties acting on Jindal Films' behalf are prohibited from offering or paying, directly or indirectly, any bribe to any employee, official, or agent of any government, commercial or proscribed entity, or individual in connection with Jindal Films business or activities. For the purposes of this policy, a bribe is any money, goods, services, or other thing of value offered or given with the intent to gain any improper advantage for the business.

### **POLITICAL ACTIVITIES POLICY**

If it chooses to do so, Jindal Films will make contributions to political candidates and political parties only as permitted by applicable law and authorized by the Management Committee. It acknowledges, however, that directors, officers and employees may pursue political activities, including financial contributions to parties or candidates of their choice, as private citizens and not as representatives of Jindal Films. Personal, lawful decisions to make political contributions (or to refrain from doing so) will not influence compensation, job security or opportunities for advancement.

### **SAFETY, HEALTH AND ENVIRONEMENT (SHE) POLICY**

In all of its activities, Jindal Films is firmly committed to care for the safety and health of its employees, customers and the community, and to protect the environment.

#### SHE Philosophy

- All injuries and occupational illnesses, as well as environmental incidents, are preventable. Our goals are that nobody gets hurt and to protect the environment.
- Management is responsible for SHE; everyone in the organisation should act to protect himself, his colleagues and the environment.
- Targeting excellence in the management of safety, health and the environment is vital to ensuring the long term future of the company.

### SHE Principles

- Managers demonstrate strong SHE leadership and set high standards in their commitment to SHE.
- SH&E responsibilities for all employees and contractors are defined and communicated.
- We comply, as an absolute minimum, with all national, regional and local legal related to our Safety and Health hazards & Environmental aspects.
- Appropriate information, training, coaching, supervision are provided to all employees and contractors.
- Continuous effort is pursued to identify the hazards and to assess, prioritise and control the risks associated with all our activities.
- Demanding SHE targets are periodically set and appropriate reviews undertaken to monitor performances through a balanced set of leading and lagging indicators.
- Our employees and other stakeholders get feedback / are consulted on SHE issues and performance. This policy is available to anyone interested.
- Quick and effective response is provided to emergencies and accidents resulting from our operations.
- Compliance with and effectiveness of our SHE management systems is reviewed; incident investigations and audits outcomes are used to stimulate continuous improvement.

### **PRODUCT SAFETY POLICY**

Jindal Films will:

- comply with all applicable laws and regulations; and maintain health, safety, environmental, and hygiene certifications;
- identify and manage risks associated with its products and not manufacture or sell products when it is not possible through proper design, procedures, and practices to provide an appropriate level of safety for people and the environment;

- specify precautions required in handling, transporting, using, and disposing of its products and communicate them to employees, customers, and others who might be affected;
- include identification and control of potentially adverse health, safety, and environmental effects as priority considerations in the planning and development of products;
- promptly share information about product issues, as appropriate, with its employee, contractors, customers and government agencies;
- undertake appropriate reviews and evaluations of its operations to measure progress and to foster compliance with this policy

## **CUSTOMER RELATIONS AND PRODUCT QUALITY POLICY**

At Jindal Films, we are committed to providing our customers with products that consistently meet or exceed their expectations.

To fulfill this commitment, we will:

- Continuously strive to clearly understand our customers' expectations
- Embed process of continuous improvement into our Quality Management System to always deliver better performances at the right cost
- Leverage on Jindal's personal expertise to meet customer's expectations.
- Provide honest, ethical, accurate and timely information allowing customers to make informed purchasing decisions
- Provide accurate and timely communication, transactions, and delivery to satisfy customer orders
- Actively encourage our third party providers to apply standards comparable to those established for Jindal Films' own performance

## **ALCOHOL AND DRUG USE POLICY**

Alcohol, drug, or other substance abuse by employees will impair their ability to perform properly and will have serious adverse effects on the safety, efficiency and productivity of other employees. The misuse of legitimate drugs, or the use, possession, distribution or sale of illicit or unprescribed controlled drugs while on company business or premises, is strictly prohibited and is grounds for termination. Possession, use, distribution, or sale of alcoholic beverages on company premises is not allowed without prior approval of appropriate senior management. Being unfit for work because of use of drugs or alcohol is strictly prohibited and is grounds for termination of employment. While this policy refers specifically to alcohol and drugs, it is intended to apply to inhalants and all other forms of substance abuse.

Alcohol or drug dependency is frequently a treatable condition. Employees who suspect they have alcohol or drug dependencies are encouraged to seek advice and to follow appropriate treatment promptly before it results in job performance problems. Health advisory or medical professional staff will advise and assist employees in securing treatment. Those employees who follow approved treatment will receive disability benefits in accordance with the provisions of established benefit plans and medical insurance coverage consistent with existing plans.

No employee with alcohol or drug dependency will be terminated due to the request for help in overcoming that dependency or because of involvement in a rehabilitation effort. But an employee who has had or is found to have a substance abuse problem will not be permitted to work in designated positions identified by management as being sensitive for the safety and wellbeing of employees, the public, or the business. Any employee returning from rehabilitation will be required to participate in a business-approved aftercare program. If an employee violates provisions of the employee Alcohol and Drug Use policy, appropriate disciplinary action will be taken. Such action cannot be avoided by a request at that time for treatment or rehabilitation. If an employee suffering from alcohol or drug dependency refuses rehabilitation or fails to respond to treatment or fails to meet satisfactory standards of effective work performance, appropriate disciplinary action, up to and including termination, will be taken. This policy does not require and should not result in any special regulations, privileges, or exemptions from normal job performance requirements.

Jindal Films may conduct unannounced searches for drugs and alcohol on company owned or controlled property. It may also require employees to submit to medical evaluation or alcohol and drug testing where cause exists to suspect alcohol or drug use, including workplace incidents. Unannounced periodic or random testing may be conducted when an employee meets any one of the following conditions: has had a substance abuse problem, or is working in a position identified by management as safety-sensitive or in a position where testing is required by law. A positive test result or refusal to submit to a drug or alcohol test is grounds for disciplinary action, including termination.

Contractor, common carrier, and vendor personnel are also covered by paragraph one and the search provisions of paragraph four of this policy. Those who violate the policy will be removed from company premises and may be denied future entry.

In addition to the above policy, to the extent allowed by applicable law, all applicants accepting offers of regular employment must pass a drug test.

## **EQUAL EMPLOYMENT OPPORTUNITY POLICY**

Jindal Films will provide equal employment opportunity in conformance with all applicable laws and regulations to individuals who are qualified to perform job requirements regardless of their race, color, sex, religion, national origin, citizenship status, age, genetic information, physical or mental disability, veteran or other legally protected status. It administers its personnel policies, programs, and practices in a nondiscriminatory manner in all aspects of the employment relationship, including recruitment, hiring, work

assignment, promotion, transfer, termination, wage and salary administration, and selection for training.

Managers and supervisors at every level of the organization are responsible for implementing and administering this policy, for maintaining a work environment free from unlawful discrimination, and for promptly identifying and resolving any problem area regarding equal employment opportunity.

Individuals who believe they have observed or been subjected to prohibited discrimination should immediately report the incident to their supervisors, higher management, or their designated Human Resources Department contacts.

Individuals will not be subjected to harassment, intimidation, threats, coercion, discrimination, or retaliation for opposing any unlawful act or practice, or making a complaint, assisting or participating in an investigation or any other proceeding, or otherwise exercising any of the rights protected by this policy or any federal, state, or local EEO laws.

## **HARASSMENT IN THE WORKPLACE POLICY**

Jindal Films prohibits any form of harassment in any company workplace. The policy prohibits unlawful harassment based on race, color, sex, religion, national origin, citizenship status, age, genetic information, physical or mental disability, veteran or other protected status, as well as any other form of harassment, even if the harassing conduct is lawful. The objective of this policy is to provide a work environment that fosters mutual employee respect and working relationships free of harassment. The policy specifically prohibits any form of harassment by or toward employees, contractors, suppliers, or customers.

Harassment is any inappropriate conduct, which has the purpose, or effect, of:

- creating an intimidating, hostile, or offensive work environment;
- unreasonably interfering with an individual's work performance; or
- affecting an individual's employment opportunity.

Harassment will not be tolerated. Forms of harassment include, but are not limited to, unwelcome verbal or physical advances and sexually, racially, or otherwise derogatory or discriminatory materials, statements, or remarks. All employees, including supervisors and managers, will be subject to disciplinary action up to and including termination for any act of harassment.

Individuals who believe they have been subjected to harassment should immediately report the incident to their supervisors, higher management, or their designated Human Resources Department contacts. Where required by applicable law, the company will designate an appropriate person to follow up harassment complaints and all complaints will be promptly and thoroughly investigated.

Employees or supervisors who observe or become aware of harassment should immediately advise their supervisors, higher management, or their designated Human Resources Department contacts. No employee should assume that the business is aware of a problem. All complaints and concerns should be brought to Management's or the Human Resources Department's attention so that appropriate corrective steps can be taken.

No retaliation will be taken against any employee because he or she reports a problem concerning possible acts of harassment. Employees can raise concerns and make reports without fear of reprisal. Questions about what constitutes harassing behavior should be directed to the employee's supervisor or Human Resources Department contact.

## **OPEN COMMUNICATION POLICY**

Jindal Films encourages employees to ask questions, voice concerns, and make appropriate suggestions regarding its business practices. Employees are expected to report promptly to Management suspected violations of law, business policies, and internal controls, so that Management can take appropriate corrective action. The business promptly investigates reports of suspected violations of law, policies, and internal control procedures.

Normally, an employee should discuss such matters with the employee's immediate supervisor. Each supervisor is expected to be available to subordinates for that purpose. If an employee is dissatisfied following review with the employee's immediate supervisor, that employee is encouraged to request further reviews, in the presence of the supervisor or otherwise. Reviews should continue to the level of Management appropriate to resolve the issue.

Depending on the subject matter of the question, concern, or suggestion, each employee has access to alternative channels of communication, for example, the Human Resources Department; the Law Department; and the Safety, Health and Environment Department.

All persons responding to employees' questions, concerns, complaints, and suggestions are expected to use appropriate discretion regarding anonymity and confidentiality, although the preservation of anonymity and confidentiality may or may not be practical, depending on the circumstances. For example, investigations of significant complaints typically necessitate revealing to others information about the complaint and complainant. Similarly, disclosure can result from government investigations and litigation.

No action may be taken or threatened against any employee for asking questions, voicing concerns, or making complaints or suggestions in conformity with the procedures described above, unless the employee acts with willful disregard of the truth.

Failure to behave honestly and failure to comply with law, policies, and internal controls may result in disciplinary action, up to and including termination.