

CODE OF ETHICS

Cod. 001

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July 25, 2018

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INTRODUCTION

All human behavior affects those around them and therefore principles and values are necessary to allow the individual to act under certain rules that regulate their conduct.

Nowadays in our society moral and spiritual values seem to be losing importance in a very significant way, and that is why at **Plastilene Group** we consider it necessary to put into effect the Code of Ethics with the aim of unifying and strengthening good practices of conduct so as to comply with the highest moral and professional standards. The implementation of these principles and values, as well as of the duties and responsibilities pertaining to them, will encourage our growth as honest citizens while promoting a culture of transparency and legality in relations between employees, customers, suppliers, and authorities.

DEFINITION OF ETHICS

Ethics is the set of principles and values that govern the correct behavior of our organization and its employees.

PURPOSE

This Code of Ethics sets out the principles and values that govern the behavior of all **Plastilene Group** employees. These principles are aimed at establishing the behavior of employees among themselves, as well as in relation to customers, suppliers, and society in general.

SCOPE

This Code of Ethics is a personal and binding commitment. It has been defined for its observance by all the **Plastilene Group's** employees.

DEFINITION OF CONFLICT OF INTEREST

A conflict of interest is a situation in which the interests of the company are in conflict with the personal interests of employees or their families. An employee who acts in a situation affected by a conflict of interests may be tempted to assume a behavior that goes against our code of ethics. The



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employee might negatively affect our company by acting under different parameters than those established to ensure the proper fulfillment of their duties to the company.

A conflict of interest can be avoided if employees are made accountable for not generating income for their benefit from the company beyond the one strictly labor-related.

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CODE OF ETHICS:

A. GENERAL ETHICAL PRINCIPLES:

1. We recognize human dignity and equality.
2. We respect and comply with the principles of equity and justice.
3. We respect work as a product of the responsibility and creativity of our collaborators.
4. We respect and protect the people in our charge.
5. We comply with all legal regulations, especially those concerning our processes and the manufacturing of our products.
6. We look after the wellbeing and safety of all our workers in order to improve quality of life for them and for their families.
7. We believe in active and voluntary contributions for the improvement of the living conditions for our collaborators and of society. The programs of help to the community are a manifestation of this belief.
8. We comply with the obligations and commitments agreed on with clients and suppliers.
9. We respect the freedom of organizations that are constituted in the exercise of the principles of human society.
10. We respect environmental laws and regulations and commit ourselves to the protection and preservation of the environment in the countries where our companies are present.

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B. DUTIES AND LIABILITIES:

1. **Plastilene Group** does not permit, nor does it tolerate the participation of its employees in any form of illegal or criminal behavior.
2. In case of a criminal offence, the company will comply with the constitutional and legal dispositions to this respect.
3. To be correct in the use of the company's assets, remembering that we are the administrators for such assets and that we have been given the trust of such administration.
4. To act in good faith and with diligence in the management of the resources that have been given to us in order to carry out our tasks.
5. To use the position within the company for the benefit of **Plastilene Group** and not for profit or for personal gain.
6. To use and manage information of **Plastilene Group**, for the benefit of Plastilene Group and not for that of third parties.
7. To refrain from entering into business where there may be a conflict between personal interest and the interest of **Plastilene Group**.
8. To inform superiors about real or potential conflicts of interest, either for employee, other employees, or third parties.
9. To refrain from negotiations with former employees who were dismissed from **Plastilene Group** for conduct contrary to the company's interests.

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10. To avoid giving or receiving gifts or entertainment that could give the appearance of improper influence over a business decision or relationship.
11. In case of persistence by a third party in providing a gift, the employee must inform his superior and Human Management about the irregularity. The superior and Human Management will decide on the suspension of any relationship with the third party in question. The decision will be communicated to the employee that provided the information.
12. To report any act or attempt of bribery.
13. To report conducts and situations that could go against **Plastilene Group's** policies and values.
14. To avoid any form of discrimination based on race, origin, nationality, social or economic class, pregnancy, language, religion, gender, disability, or sexual orientation.
15. To avoid abuse of power due to the position held within **Plastilene Group**.
16. To treat all people with dignity and respect, avoiding denigration and derogatory statements.
17. To act with impartiality and honesty in all activities.
18. To behave with fairness and respect to all employees.
19. To provide equal opportunities to employees, according to established policies, in areas such as study, development, training, promotion, wages, compensation and work and family benefits.
20. To serve, listen, support and provide solutions to employees who

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require the company's services, taking into account the company's possibilities.

21. Report acts of physical and/or disciplinary abuse, acts of sexual harassment and intimidation, and acts of undue psychological pressure.
22. To report any act of harassment, intimidation or verbal abuse that diminishes the capacity and respect of the employee.
23. To comply with the law.
24. To comply with **Plastilene Group's** policies, rules and procedures.
25. **Plastilene Group** prohibits child labor and establishes as an essential rule that none of its employees will be underage. Likewise, all contractors or subcontractors that provide any type of service to any of the **Plastilene Group** companies may not have minors among their contracted employees.

Non-compliance with any of these dispositions will result in disciplinary proceedings and, depending on the seriousness of the offence, the employee may be dismissed from **Plastilene Group**.

Likewise, all individuals in the area of Management and heads of divisions are committed to ensure that the terms of this Code of Ethics are complied with in full and without any objection, and that they are clearly communicated to all employees.

Plastilene Group encourages all employees to act within the rules established in these guidelines.

The Management and heads of divisions are committed to set an example with their actions and procedures, following the guidelines established in this Code.

Business managers and corporate managers are responsible for ensuring that these guidelines are implemented and carried out by all **Plastilene Group**

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employees.

WHAT TO DO WHEN SOMEONE BREAKS THE CODE OF ETHICS

Whenever someone from **Plastilene Group** does not comply with the precepts outlined in this Code of Ethics, the employee must report it to his/her Immediate superior. If the offender happens to be the same superior, the corporate head of human resources should be informed and the case transferred to the general manager for the correct disciplinary measures, in accordance with the legal dispositions in force in each country and in the internal work regulations.

**STEFANO
PACINI PRESIDENT
PLASTILENE GROUP**