

PROCESS TECHNOLOGIES & PACKAGING

Code of Conduct

Process Technologies & Packaging LLC will conduct its business honestly and ethically wherever we operate in the world. We will constantly improve the quality of our services, products and operations and will create a reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgment. No illegal or unethical conduct on the part of officers, directors, employees, affiliates, suppliers or subcontractors is in PTP's best interest. PTP will not compromise its principles for short-term advantage.

Officers, directors, employees, affiliates, suppliers or subcontractors of PTP must never permit their personal interests to conflict or appear to conflict, with the interest of PTP, its customers or affiliates. Officers, directors, employees, affiliates, suppliers or subcontractors must be particularly careful to avoid representing PTP in any transaction with others with whom there is any outside business affiliation or relationship. They also should avoid using their company contacts to advance their private business or personal interests at the expense of PTP, its customers or affiliates.

No bribes, kickbacks or other similar remuneration or consideration shall be given to any person, organization, or government entity in order to attract or influence business activity. Officers, directors, employees, affiliates, suppliers and subcontractors shall avoid gifts, gratuities, fees, bonuses or excessive entertainment, in order to attract or influence business activity as to compromise their duty of loyalty to PTP.

Officers, directors, employees, affiliates, suppliers and subcontractors of PTP will often come into contact with, or have possession of, proprietary, confidential or business-sensitive information and must take appropriate steps to assure that such information is safely safeguarded. This information – company-owned or customer-supplied – could include strategic business plans, operating results, marketing strategies, formulas, bill of materials, customer lists, personnel records, upcoming acquisitions and divestures, new investments, and manufacturing costs, processes and methods. Proprietary, confidential and sensitive business information about PTP, its customers, and any other related parties should be treated with sensitivity and discretion and only disseminated on a need-to-know basis at the approval of PTP's management and/or legal counsel.

In addition to requiring the above, suppliers and subcontractors of PTP must adhere to the following standards:

1. Legal Compliance – PTP shall conduct business with suppliers that are in full compliance with the laws of the countries and regions where they operate. PTP shall favor suppliers that meet stricter international and industry standards than such mandated by law.
2. Labor – PTP shall conduct business with suppliers that are in full compliance with the labor laws of the countries and regions where they operate and that respect the rights of their employees in accordance with applicable standards including:
 - a. Child & Forced Labor – Suppliers shall not engage in the use of child labor, forced labor or other forms of compulsory labor.
 - b. Non-discrimination – Suppliers shall not discriminate against their employees in hiring practices or treatment on the basis of race, ethnicity, nationality, religion, beliefs, gender, marital status, descent, disability, illness, sexual orientation or age.
 - c. Safety, Sanitation & Health – Suppliers shall maintain a safe, clean and healthy workplace for their employees in compliance with applicable law.
 - d. Wages and Working Hours – Suppliers shall pay a wage that is not less than the minimum wage required under applicable law. Suppliers shall comply with laws applicable to working hours.
3. Verification of Compliance – Suppliers may be required to submit answers to questionnaires and produce documentation verifying their compliance with the above standards and adherence to PTP's Code of Conduct.

Any questions or concerns please contact Shawwna Giumento, Director of Finance & Administration at sgiumento@processtechnologies.com or 570-587-8326 x 222