



PAHARPUR 3P-BUSINESS ETHICS



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This document defines the behavioural framework and values we, at Pahrpur-3P, are committed to and it is up to each of us to put those values into action.

It defines how we should conduct ourselves with integrity, both as team members and as decision-makers.

Read this thoroughly and keep it as a reference. Although it covers a number of ethical and business issues it may not resolve or address every question that you may have or every situation that you may encounter. In those circumstances, use good judgment and do not hesitate to seek guidance.

Contact your Human Resources representative for more detailed corporate and local policies. When in doubt, always remember that ethical behaviour takes precedence over profits, sales, career advancement or other standards of business success.

The reputation of Paharpur-3P is formed by the relationships that we have with our customers, team members, and the communities in which we work and live.

A handwritten signature in blue ink, appearing to read "Mohammed Nadeem".

Mohammed Nadeem



PAHARPUR 3P-BUSINESS ETHICS

At Paharpur-3P, we are committed to creating and maintaining an ethical business culture based on the values embodied in this 'Paharpur-3P Business Ethics' document. The document defines our essence as a company and our collective commitment to what it means to be a part of Paharpur-3P and put those values into action.

Paharpur-3P is an organization of high integrity where we continuously strive to delight our customers, make it a great place to work and operate as good corporate citizens. We do this by basing our everyday decisions and actions on the highest ethical standards.

This guide provides the framework by which we operate and conduct our business.

Our Vision:

To enrich people's lives by providing access to a wide variety of safe and affordable products through sustainable packaging materials

Our Mission:

To become a world class market leader in our segment by providing innovative solutions for our customers, generating the best return in the industry and becoming the best place to work for our employees

Our Values:

a) Integrity Honesty, Ethics, Transparency & Accountability

- We will not sacrifice integrity for profit or look the other way when faced with questionable situations.
- We are committed to maintaining high ethical standards in all of our business dealings.

b) Respect Safety, Health, Teamwork, and Performance

- We provide a safe and healthy work environment for our team members.
- We strive to provide quality products that are safe to use.
- We treat all of our team members, customers and suppliers with respect and dignity.

c) Improvement

- We are committed to providing quality products and services.
- We continuously search for new and better ways of doing things – focusing on the elimination of waste and continual improvement.

d) Servant Leadership and Leading by Example

- We work to serve the needs of our customers and team members.
- We lead by example and coach those we lead to attain their maximum potential.



Who Must Follow These Ethics:

All team members are expected to carefully read and must adhere to this guide, regardless of whether the individuals are regular, temporary or contractual.

All contractors, consultants, representatives, agents and others who may be temporarily assigned to work for or provide services to the company will comply with this in connection with any work or services performed.

It is important to note that the company reserves the right to modify or revise this at any time, with or without notice, subject to applicable law. Please note that this does not set forth all policies and guidelines applicable to every team member.

1. Business Integrity and Ethical Standards Policy:

The organisation has well documented Business Integrity and Ethical Standards Policy (Annexure-A).

Paharpur-3P management team members and any team members who have supervisory responsibilities, have a special responsibility for instilling a culture of unwavering integrity, ethical business practices, and a commitment to this document. Managers must lead by example and set a tone of absolute compliance.

Managers cannot ignore violations or potential violations of any requirements in this document that they learn of through any means; rather, managers are required to report their concerns and the basis for their concerns to their superiors.

Failure to comply with this may result in disciplinary action, up to and including termination of employment. Paharpur-3P, at its discretion, may take other appropriate action, such as training or revising of policies and processes.

2. Health & Safety:

To be the best place to work, Paharpur-3P has to be a safe place to work. Your safety is important to many people: your family, your co-workers and your community. We comply with all safety laws and believe that safety comes before anything else. We recognise that the work that we perform and the environment in which we work may have health and safety risks.

Team members must know and comply with all safety standards, laws and regulations that apply to their jobs. Team members should never take risks that could endanger themselves or others in doing their jobs. We strive to eliminate accidents in all of our facilities by ensuring a safe and healthy work environment for all team members and others in the plant, and by looking for ways to continuously improve.

If you have any safety concerns, bring them to the attention of your manager, FH-EHS, FH-HR, or anyone else in the management.

3. Discrimination and Fair Treatment

The best place to work provides a positive work environment where everyone is treated with respect, dignity and fairness. Discrimination or retaliation against team members on any basis will not be tolerated. Our working relationships need to reflect our commitment to fairness and respect, and be business-like and free of any bias or prejudice.

We have a performance-oriented culture. This means that our individual performance and achievement of goals determines our advancement and compensation. Your gender, sexual orientation, age, race, national origin and/or identity and belief system, whom you know, where you went to school, or to whom you are related do not matter at Paharpur-3P. Performance and/or job qualifications are the only acceptable differentiators in the hiring, advancement and treatment of all team members. Only when we operate with this objectivity, will we move towards achieving our vision.

4. Workplace Harassment, Bullying and Violence

Each of us should be treated and should treat others with respect and dignity. There is no room in Paharpur-3P culture for harassment, bullying or violence of any kind, in any work-related setting. This includes business trips, business meetings and/or business-related social events.

We expect this same standard of behaviour to apply both to our team members and to all others with whom we work, such as outside vendors, consultants and customers.

Harassment can take many forms – verbal, nonverbal, physical or sexual. Harassment is any behaviour that makes others feel unwelcome, uncomfortable or is intended to intimidate or prevent them from effectively performing their job. Examples include negative stereotyping, threats or intimidation, demeaning jokes, and circulating or posting inappropriate materials. Sexual harassment can include a range of behaviours, some more subtle than others, such as unwelcome advances, demeaning comments, jokes, language or gestures.

5. Commitment to Product Quality and Safety

Being a responsible corporate citizen requires that we provide quality products that are safe to use. The products manufactured by Paharpur-3P should meet all applicable laws, regulations and standards for use. To accomplish continual improvement of our products and services, we listen to our customers and strive to exceed customer expectations at every opportunity. By doing this, we believe our customers will view us as the most customer responsive company in the industry.

6. With Our Customers and Marketplace

Our team members must conduct business with transparency that can stand the test of anyone's scrutiny. In addition to being the best place to work, we strive to be the most customer responsive company in the industry as determined by our customers.

We are driven by our mission to delight customers with value-added offerings that exceed their current and future needs. We will achieve this by competing fairly, with the highest level of integrity, in every market where we operate. This is integral to our operations and key to our long-term success.

We operate with integrity in the marketplace and compete based on the merits of the products we produce and the services we provide. We deal honestly and fairly with our customers, suppliers, team members, business partners, competitors and other stakeholders.

Team members must never misrepresent facts, conceal information, abuse confidential information or use manipulation to obtain an unfair advantage when conducting business on behalf of Paharpur-3P.

7. Transactions and Relationships with Suppliers

Operating with a high level of integrity means we also choose our suppliers objectively, based on criteria such as quality, delivery, total cost of service and the supplier's integrity.

We base our supplier relationships on principles of fairness and mutual respect. We believe in doing business with those who share our high standards of business conduct.

The organisation has well documented Ethical Trading Policy (Annexure-B) and all suppliers and service providers are required to comply with this.

Paharpur-3P will terminate the services of contractors, consultants and others who are assigned to work for or provide services to Paharpur-3P if they fail to comply with this

8. With Our Communities

We are good stewards of the environment and of the communities in which we live. We strive to make the world we live in a better place. We are good global, national and local citizens.

We operate in an environmentally conscious and respectful manner indicating our commitment to being good corporate citizens and what is expected of all team members in this regard.

9. Environment

We are committed to full compliance with both the spirit and the letter of all environmental laws and regulations.

In addition to knowing and complying with all applicable environmental laws and regulations, each team member has a personal responsibility to report to management any violations or spills, discharges or releases into the environment for immediate remedial action.

Team members must promptly report such known or suspected violations or spills, discharges or releases to their supervisor, FH-EHS or FH-HR.

Additionally, bypassing any environmental control or monitoring device in violation of law or permit conditions is strictly prohibited. All applicable permits will be obtained and the terms of those permits upheld.

In each of our operations, we are committed to environmental protection by reducing and preventing waste, discharges and releases into the environment. We are also committed to safely using, handling, transporting and disposing of all raw materials, products and wastes.

We operate in an environmentally conscious and respectful manner and help others understand their environmental responsibilities when they use our products. Our commitment to protecting the environment is a responsibility shared by each of us.

The Company prohibits, without exception, the entry of information known to be false on any governmental form, on any monitoring report, or in response to any request for information from any governmental agency.

10. Compliance

Our team members are responsible for ensuring compliance with all applicable laws and regulations.

They train the staff reporting to them, at least annually, on applicable elements of the business ethics of the organisation and validate their understanding of the compliance requirements.

They are accountable for all aspects of implementation, communication, evaluation and enforcement of the business ethics at their respective functions. This includes the risk assessment to evaluate the effectiveness of the compliance, addressing the issues identified and implementation of the controls to reduce the identified risk.

Proper handling and recording of the financial transactions, including management of any fraudulent records identified, and actions to avoid money laundering are carried out by the finance team members.



PAHARPUR 3P-BUSINESS ETHICS
Annexure-A



BUSINESS INTEGRITY AND ETHICAL STANDARDS POLICY

Ethical behaviour is essential to the way we operate and the success of our business. Our values of Integrity, Respect, Continual Improvement, Servant Leadership, Sustainable Profitable Growth, and Innovation guide our behaviours and the standards we set for ourselves as employees of Paharpur-3P. It is fitting that they are the cornerstone of this Business Integrity and Ethical Standards Policy.

As individuals, collectively and as a company we will:

1. Apply the principles set out in the Business Integrity and Ethical Standards Policy in everything we do.
2. Ensure that we comply with company policies and procedures.
3. Comply with applicable laws, rules, and regulations and where the standards of behaviour expected by Paharpur-3P are higher we will apply these higher standards.
4. Seek guidance where we are unsure of the appropriate course of action.

This Business Integrity and Ethical Standards Policy sets out the standards and behaviours that all our people are expected to meet, wherever in the world we operate. This document also provides more detailed information on the issues it covers.

As the document cannot give you the answer to every situation or event that you may face in your role, please ask for help from superiors. However, it seeks to provide the primary guidance you should follow and sets out an ethical decision making tool. This should help you consider if your course of action is appropriate or if you need to seek further advice and guidance for that.

“Managers must lead by example and set a tone of absolute compliance.”



BUSINESS INTEGRITY AND ETHICAL STANDARDS POLICY

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1. Fraud, Bribery, and Corruption

1.1 Prohibition of Fraud, Bribery, and Corruption.

Paharpur-3P takes extremely seriously the effective prevention and detection of fraud, bribery and corruption and any other fraudulent or corrupt activity. It will not tolerate them in any form. The Management is fully committed to promoting a zero tolerance approach across the group. As well as being illegal, fraud, bribery, corruption and any other fraudulent or corrupt activity are damaging to all parties who engage in them.

1.2 Definitions

Corruption usually occurs because some individuals are willing to use illicit means to maximise personal or corporate profit. Corruption includes bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement, trading in influence and money laundering.

A **bribe** is not necessarily just a gift of money. It is an action where a person promises or gives a financial or other advantage which is designed to induce any party to perform a function improperly or reward them for having performed a function improperly. The payment or monetary value need not be of large value – for example it could be an invitation to a sporting event.

Fraud is an act of deception intended for personal gain or to cause a loss to another party. The general criminal offence of fraud can include deception whereby someone knowingly makes false representation, or they fail to disclose information, or they abuse a position.

1.3 Principles. We will not offer, give, or receive bribes or improper inducements for any purpose, whether directly or via a third party. This prohibition applies to employees, subsidiaries, business partners, suppliers, agents and anyone else acting for or on behalf of Paharpur-3P. Our policy applies to every part of our business and to every part of the world in which we operate.

We expect all staff to act honestly and with integrity to safeguard Paharpur-3P and our customers' assets, including information, goodwill, property, and equipment. We each have a responsibility for fraud prevention, detection, and reporting and the management encourages anyone with reasonable suspicions of fraud or corruption to report them. All cases of attempted, suspected, or proven fraud or corruption will be investigated and dealt with appropriately. No employee will suffer as a result of reporting reasonable suspicions.



1.4 Facilitation Payments. In some situations our people may be asked for a payment to carry out or speed up a process. Such payments are known as facilitation payments. They are considered as a bribe, as such they are illegal, and they are prohibited by this Policy.

1.5 Supporting our People. Paharpur-3P will not penalise any employee by demotion, penalty or otherwise where an employee refuses to accept or pay a bribe, make a facilitation payment or engage in any form of fraudulent or corrupt activity, even if that refusal results in a loss of business to Paharpur-3P

1.6 Political donations. Political donations can be perceived as unduly influencing a third party. Paharpur-3P does not support or engage in any form of political donations. No employee or Paharpur-3P group company will be permitted to make a political donation on behalf of or in Paharpur-3P name.

We must all be particularly vigilant concerning gifts, hospitality, and the actions of third parties engaging in transactions on our behalf. These three areas can frequently involve giving or accepting a bribe in ways which are not immediately identifiable. Anyone who is offered a bribe or asked for a bribe, or is aware of any form of fraudulent or corrupt activity should report that immediately to their Manager.

2. Gifts and Hospitality

2.1 Gifts and Hospitality. You should always consider whether the giving or receiving of a gift/hospitality is appropriate. It is prohibited to offer or receive gifts or hospitality that could influence or be perceived to be capable of influencing the outcome of transactions or decisions relating to Paharpur-3P business.

2.2 Your Responsibilities. We are each responsible for knowing what our business guidance allows in respect of receiving and giving gifts and hospitality. Always seek guidance and approval from your Manager before accepting or giving any gifts or hospitality.

2.3 Recording Benefits. All benefits must be recorded in a register to ensure transparency and avoid accusations of misconduct.

3. Internal Information

3.1 Internal Information

There are restrictions in Paharpur-3P to ensure that employees do not abuse confidential and so-called internal information they may have.

3.2 Persons Discharging Managerial Responsibilities

There are particular requirements which apply to Paharpur-3P people who are defined as persons discharging managerial responsibilities and those who have internal information. Where possible, we will advise those people who fall within these categories. They must not abuse nor place themselves under suspicion of abusing internal information.



4.0 Conflicts of Interest

4.1 Conflicts of Interest.

All Paharpur-3P people must disclose or seek direction on any issues that could potentially conflict with their responsibilities to the company.

4.2 What is a Conflict of Interest?

Conflicts of interest may arise when two or more competing interests could impair the ability to make objective, unbiased business decisions, which are not necessarily in the best interests of Paharpur-3P. Conflicts of Interest may take the form of financial interests in a competitor, supplier, or customer business, recruiting a close family member, close or longstanding friendships, or relationships with competitors, suppliers, or customers or engaging in employment outside Paharpur-3P.

4.3 Disclosure.

In all cases potential conflicts of interest should be disclosed to your Manager, discussed openly, and recorded. An annual update will be required.

5. Ethical Procurement

5.1 Working with Others.

We must ensure that we maintain our ethical standards and behave respectfully when working with others. The relationships with our suppliers and business partners are based on the principle of fair and honest dealings at all times and in all ways. We expect our suppliers and business associates and joint venture partners to extend the same high standards to all others with whom they do business, including employees, sub-contractors and other third parties.

5.2 Adoption of Policy.

We expect all of our business associates, joint venture partners, and suppliers to adopt the same or equivalent standards as set out in this Business Integrity and Ethical Standards Policy and we reserve the right not to do business with companies where it can be demonstrated that significant violations of the policy exist.

5.3 Code of Ethics.

There is an unwritten code of ethics for all employees involved in purchasing and supply chain management which will ensure sustainable procurement system. This must be followed.

6. Competition

6.1 Competition Law

Paharpur-3P and associated companies under Paharpur-3P control have a policy that all business activities are carried out in full compliance with competition laws – the laws which prevent anti-competitive behaviour. Competition law prevents us from carrying out any activities that restrict competition and makes illegal activities such as price fixing, unfair pricing, market sharing, and refusal to supply customers.

6.2 Paharpur-3P commitment.

We are committed to winning and keeping customers in an open, competitive, and legal manner. Any failure to comply with competition laws could have serious adverse consequences for Paharpur-3P and its employees.



7. Money Laundering

7.1 Money Laundering.

Paharpur-3P aims to maintain our high standards of conduct by preventing criminal activity through money laundering.

8. Respect for Human Rights

8.1 Universal Declaration on Human Rights.

We support the belief that human rights are universal and adhere to the principles of human rights in our operations. We work hard to ensure that in all areas of interaction with our employees, clients, suppliers, third parties, interviewees, and joint venture parties that everyone is protected and treated absolutely fairly.

8.2 Diversity.

Paharpur-3P respects and embraces diversity and expects its employees, suppliers and business partners to do the same.

8.3 Training Programmes.

As applicable, our people are required to undertake health and safety and equality and diversity training programmes. Your Manager will be able to give you guidance on whether you are required to take these training programmes.

9. Laws and Regulations

9.1 Laws and Regulations

Paharpur-3P respects the rule of law in all of our dealings and has, as a minimum standard, compliance with all laws and regulations to which our businesses are subject.

9.2 Consequences.

Failure to comply with the laws and regulations will place at risk Paharpur 3P and its people and result in potentially significant legal, financial, reputational, and personal consequences.

9.3 Training Programmes.

Paharpur-3P develops training and compliance programmes for those of its people who can best ensure compliance with relevant legal issues. All employees selected for inclusion in those issues must attend a training session periodically when called upon to do so by Paharpur-3P.

10. Reporting, Disclosure and Whistle Blowing

10.1 Responsibility

All Paharpur-3P people have a responsibility to protect Paharpur-3P assets, including information and goodwill as well as property. Paharpur-3P encourages its people to raise genuine concerns about malpractices at the earliest possible stage and in the right way.

10.2 Concerns

Concerns will be treated seriously and investigated appropriately, where possible you will be kept up to date with progress.



PAHARPUR 3P-BUSINESS ETHICS

Annexure-B



ETHICAL TRADING POLICY

1. Introduction

We are responsible to share with our suppliers that we source products and services in an ethical manner. We also recognise that our customers have to be confident that the people who make our inputs and provide us services are treated fairly, they are not exploited and are not exposed to unsafe working conditions.

Our Ethical Trading Policy is a core element of our commitment to buy and sell our products responsibly. It requires all our suppliers to comply with our Ethical Trading Code (ETC), which is given in this document. It is based on the national and international laws. Our ETC is also referenced in our Standard Terms & Conditions of Purchase with suppliers.

We are a member of Sedex (Supplier Ethical Data Exchange) through which we share the ethical procedures followed by us with our customers. We also expect all our suppliers to have ethical processes and policies in place throughout their supply chain.

We will monitor compliance with this policy through supplier audits to ensure that our suppliers are maintaining the requirements of ETC.

2. Scope

This policy applies to all suppliers of goods and services to Paharpur-3P.

3. Implementation Principles

We are committed to ethical trading and it forms a key part of our corporate responsibility. We recognise the need to communicate this commitment to our suppliers and the people who work for our suppliers. We seek to develop long-term relationships with our suppliers who share our ethical principles. The relationships with suppliers are based on the principles of fair, open and honest dealings at all times and we expect the same from our suppliers.

4. Paharpur-3P Ethical Trading Code (ETC)

The requirements of the Paharpur-3P ETC constitute the minimum and not maximum. Suppliers shall at all times comply with this code and with all applicable national and international laws, regulations, codes and standards, both in the country in which the supplier works and in the country in which the product and/or services are sourced/provided. Suppliers shall ensure, as far as is reasonably practicable, that their suppliers and service providers, who are directly or indirectly involved in the provisions of goods and services to Paharpur-3P comply with this code.

5. Suppliers shall ensure that:

1. EMPLOYMENT IS FREELY CHOSEN

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workmen are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after the agreed notice period.

2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

- 2.1 Workmen, without distinction, have the right to join or form trade unions of their own choice and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workmen representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workmen shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned Workmen.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workmen.
- 3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. CHILD LABOUR SHALL NOT BE USED

- 4.1 There shall be no recruitment of child labour.
- 4.2 Suppliers shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 These policies and procedures shall conform to the provisions of the relevant laws.

5. LIVING WAGES ARE PAID

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workmen shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures shall be recorded.



6. WORKING HOURS ARE NOT EXCESSIVE

6.1 Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

6.2 In any event, workmen shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime work shall be voluntary, shall not exceed the number of hours per week as permitted by the national law. Overtime work shall not be demanded on a regular basis and shall always be compensated at a premium rate as per the national law.

7. NO DISCRIMINATION IS PRACTICED

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. REGULAR EMPLOYMENT IS PROVIDED

8.1 To every extent possible work performed must be on the basis of recognised employment relationships established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. NO HARSH OR INHUMANE TREATMENT IS ALLOWED

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

The provisions of this code constitute minimum requirements and not maximum, and this code should not be used to prevent suppliers from exceeding these requirements. Suppliers applying this code are expected to comply with national and other applicable law and, where the provisions of law and this ETC address the same subject, to apply that provision which affords the greater protection.

10. DEFINITIONS:

Child: Any person less than 18 years of age. If local minimum age law stipulates a higher age for work or mandatory schooling, the higher age applies.