

CODE OF CONDUCT

POLYPAL, CUSTOMERS , SUPPLIERS AND COLLABORATORS



I. Scope of application

The objective of this Code is to establish the ethical principles and standards of conduct that customers, suppliers and POLYPAL collaborators (hereinafter referred to as “business partners”) must maintain and respect for the proper development of their activity.

POLYPAL considers especially important to transmit this Code of conduct not only within its organization, but also to all business partners with whom the company has established business relationships. Publicizing these ethical principles and standards of conduct will, undoubtedly, help to create a framework of trust and strong commitment that will serve to build and maintain stable and lasting business relationships.

In accordance with the foregoing, all POLYPAL business partners have the obligation and duty to know and act in accordance with the ethical principles and standards of conduct contained in this Code.



II. Ethical principles and standards of conduct

a) Human and labour rights

POLYPAL extends to its business partners the commitment to the main internationally recognized laws and practices:

- Universal Declaration of Human Rights.
- The Ten Principles of the UN Global Compact and The United Nations Guiding Principles on Business and Human Rights.
- The OECD Guidelines for Multinational Enterprises.
- The International Labour Organization Declaration on Fundamental Principles and Rights at Work.

The responsibility to respect human and labour rights implies:

- Maintain **work practices consistent with the international regulations** mentioned above.
- **Forced labour.** Eliminate all forms of forced labour, understood as that which is carried out under threat of punishment or retaliation, for which the person does not volunteer.
- **Child labour.** Contribute to eradicate child labour and not tolerate or use child labour. Also avoid any underaged dangerous work that may interfere with their education or their physical, mental, moral and social development.

- **Respect for people, equal opportunities and non-discrimination.** Treat your employees with respect and dignity. Provide the same opportunities in access to work and professional promotion, ensuring non-discrimination based on race, age, sex, sexual orientation, origin, marital status, social condition, political, union or religious ideas or disability.

- **Harassment.** Reject any manifestation of violence, exploitation or sexual, physical, moral psychological harassment or abuse of authority or mistreatment.

- **Right to free association.** Guarantee the rights of unionisation, association and collective bargaining, in compliance with the applicable regulations in each case and without reprisals arising from their exercise.

b) Corruption

Business partners must carry out their business with honesty and integrity, without taking part in bribery, corruption or extortion activities, in the public or private sphere.

The business partners will not accept, offer or grant to any natural or legal person who is at the service of any authority or public or private entity, political party or candidate for public service position, commissions, gifts or remuneration in order to obtain or maintain business illicitly or other benefits.

c) Conflicts of interest

Business partners should avoid any activity that creates a conflict of interest. In addition to maintaining mechanisms to identify and resolve any situation of real or potential conflict of interest of any of its employees.

d) Transparency

Books and records. Books and records must be kept accurate and transparent at all times and demonstrate compliance with applicable laws and regulations.

Audits and evaluations. Business partners are expected to cooperate with POLYPAL analyst and auditors if requested to do so.

e) Confidentiality

Business partners must preserve and protect the confidentiality of the information to which they have access as a result of the performance of their business with POLYPAL, such as personal data, sensitive information or privileged information.

f) Personal data protection

Just as POLYPAL guarantees the protection of the data of its employees and its business partners, and makes appropriate use of them, it requests that its business partners also comply with the applicable legislation on data protection and privacy.

Business partners must preserve and protect the confidentiality of the information to which they have access within the framework of the business relationship. They will not disclose, transfer or share confidential information or personal data without the consent of POLYPAL and they will always be used with a legitimate need.

g) Occupational health and safety in the workplace

Business partners will promote the application of occupational health and safety standards and policies.

They will ensure a safe and healthy work environment that meets the minimum requirements for occupational risk prevention. This work environment also requires at a minimum access to potable water, proper lighting, ventilation, temperature and adequate sanitary facilities.

They will preferably adopt preventive measures of technical and collective nature and when these measures are not possible they will supply the necessary PPE and all this to avoid risks and accidents. They will also have response protocols for emergency situations.

They will provide education and training for their employees on health and safety.

h) Respect for the environment

An active and responsible commitment to the conservation of the environment is expected from our business partners, complying with all legal requirements in environmental matters.

As far as possible, they will reduce the environmental impact of their activities.

III. Compliance with the Code of conduct

POLYPAL's business partners have the commitment and responsibility to respect and comply with this Code of conduct.

They will avoid any type of activity that could cause illegal practices or damage the reputation of POLYPAL.

Likewise, they will be subject to audits and investigations by POLYPAL when in its opinion there are doubts about the exact compliance with this Code by the collaborating partner, and they will collaborate proactively by providing all the complete and truthful information that is subject to being audited.

Business partners must inform POLYPAL of any breach or suspected breach of this Code. This communication will be made by email to the following address: **compliance@polypal.com**

This document became effective on 01/15/2021. It will be reviewed periodically and will be updated on the POLYPAL website: www.polypal.com

