

S-06-001-04

PEBAL GROUP CODE OF ETHICS

...PACKAGING IS ART

CODE OF ETHICS

Dear employees, business partners,

PEBAL Group a.s. adopts this Code of Ethics as a set of basic values and approaches to business that follow the conduct of their business activities.

The purpose of the Code of Ethics is to define the basic principles of the company's operation, to define the required standards of employee behaviour, both in relation to the public and within the company among employees and to motivate all employees to conduct ethical behaviour.

This Code of Ethics is a set of ethical principles, standards and rules that are binding every employee of PEBAL Group a.s., regardless of the function they perform, as well as for all those who act on behalf of the company.

The rules of the Code of Ethics are especially based on the values of reverence for human dignity, honesty, respect and responsibility.

The company highlight among its most important tasks the preservation of the good reputation of the company and the trust of all included stakeholders.

The company carries out all activities ethically and with good intentions in strict compliance with all valid legal standards.

We also expect that our suppliers adhere to the code of ethics in the performance of their business activities, because in PEBAL Group a.s. we believe that doing business the right is the only way.

Jozef Oleár
CEO



MAIN SECTIONS OF CODE OF ETHICS IN THE COMPANY PEBAL GROUP A.S.

1. Legal liability

PEBAL Group a.s. respects and follows the laws and regulations which are valid in legal system of Czech republic. It is our responsibility to know all the laws, that apply to us in all areas of our business activities such as Commercial law, Environmental law etc. We also comply with international legal system of regulations, which are applicable to our business activities.



2. Social liability and human rights

The protection and respect of fundamental human rights are one of the cornerstones of any relationship, even in case of business. Every employee of PEBAL Group a.s. is obliged to respect these rights, to observe them and to act in such a way that they are not violated. This affects activities within the company, the relationship among employees, and in negotiations or other activities related to business with our business partners.

All employees of PEBAL Group a.s. are obliged to be polite and helpful, not to favour anyone and to observe the principle of equal and fair treatment within the company and also in the relations in public.

PEBAL Group a.s. is committed, inter alia, to the general principles of human rights relating to the abolition of child labour, violence and forced labour, as well as the general principles of elimination or discrimination in respect of employment and occupation, and guarantees freedom of association.



3. Cultivated work environment

Our aim is to create suitable and pleasant conditions for the performance of our employees' work. We care how our employees feel during their work activities and we are still trying to improve their work environment, whether from the point of view of ergonomics or otherwise. The company PEBAL Group a.s. will continue to strive to create a pleasant work environment where each employee is treated with respect and dignity.

We comply with all legal regulations concerning safety and health protection at work. We carry out regular safety inspections and take measures to ensure constant safety.

Each employee is encouraged to report any suggestions for improvements in production area, occupational safety, more comfortable workplace conditions, detection of violations of the code of ethics or work regulations. Everyone can pass on suggestions to their supervisor or human resources department.

As PEBAL Group a.s. perceives the importance of suitable conditions for the performance of work activities, we also expect our employees cooperate to ensure order and cleanliness in common areas.

All employees regularly sort their waste. Employees are required to eat in designated areas. Employees are obliged to store clothes and shoes in places reserved for this purpose. We believe that a cultivated work environment creates not only a pleasant atmosphere in the workplace, but also better work results.



4. Conflicts of interest

With this principle, we would like to highlight that the interests of our company cannot be interfered by any personal interests.

Employees and board members seek to obtain an improper (or detrimental to) PEBAL Group a.s. benefit for themselves or others.

Employees and members of the Board are not permitted to trade products or services that are in direct competition with the business activities or interests of PEBAL Group a.s.



5. Property of the company

The property of PEBAL Group a.s. means production materials, goods, production equipment, office supplies, promotional items or gifts for clients, etc.

All employees of PEBAL Group a.s. are required to properly manage, use and protect both the company's tangible and intangible assets. The intangible assets of PEBAL Group a.s are considered to be trade secrets, the company's know-how and all information about customers, work procedures or technological procedures.



6. Protection of data and confidential information

Confidential internal information is accurate non-public information related to the company's business activities and is not intended for presentation outside of the company.

At a time of full dependance on information technology, it is necessary to pay attention to their protection and therefore we place great emphasis on security against misuse, loss or theft of information that is so valuable to us. We also protect data received from employees, business partners or clients with the same care.

If we are required to disclose certain confidential information to our business partners, we require them to maintain the confidentiality of that information as well.

The personal data of our employees are handled with special care and in accordance with all applicable legal regulations.



7. Maintaining confidentiality and secrecy

Confidentiality and secrecy are subject to internal and external communication, as well as all information concerning the activities of PEBAL Group s.r.o. within business relations. Each employee shall maintain the confidentiality of restricted, which he has learned in connection with the performance of his work. Company and trade secrets of PEBAL Group a.s. must be protected against disclosure to unauthorized persons both during and after valid employment contract.



8. Fair trade and fair competition

PEBAL Group a.s. will always compete in the market with respect and in accordance to the applicable law. In competition, we always act ethically and honestly and do not accept unethical or other unfair practices. We adhere to the principles of fair play and always compete in accordance with competition law, antitrust law and marketing control laws.



9. Corruption and bribery

During our business activities we always act as ethically and honestly as we do in the case of competition. It is inadmissible for us to engage in any such conduct that would establish the fact of offering, promising or providing any unlawful advantages.

Furthermore, under no circumstances is it permitted to obtain or retain any unlawful advantage in connection with the Company's business transactions. This applies to all business relationships, including relationships with business partners and all third parties acting on behalf of us.

To prevent corruption, PEBAL Group a.s. does not tolerate criminal offenses such as tax evasion, fraud or falsification of documents.

10. Internal systems and quality

As long-term holders of the ISO 9001 certificate, we pay attention to quality management and related processes. Using internal documentation, we manage individual processes in the company PEBAL Group a.s. We regularly review those processes, as well as procedure of internal documentation. We stick to the saying of what is written, it is given, and therefore we try to make the documentation subject to regular revision, to be a "living" document and not just a text on white paper.



11. Risk management

As a modern company, we try to prevent possible risks in our business activities. Today, risk prevention and risk analysis is a way to achieve even better results. For this reason, we have become the owners of the ISO 28000 certificate - Supply Chain Security Management System. We deeply care about protection of our assets and at the same time we offer added value to our business partners.

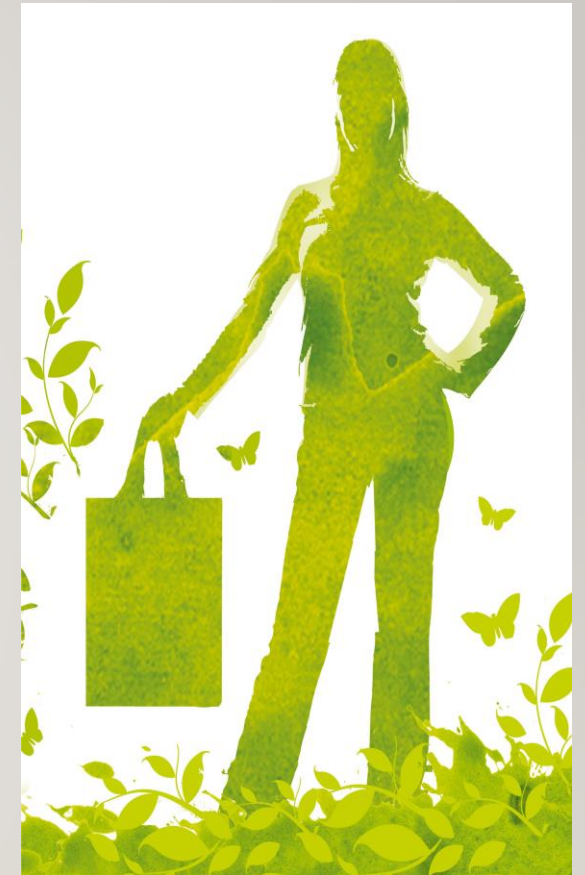
We also apply principles of risk management and their analysis in the case of changes that could affect the quality of our product.



12. Environment

We are aware that the production of our products can mean an environmental burden for our planet, so we try to minimize the impact on the environment. We are constantly working and developing products that save the nature. Since 2019, we have held the OK Home Compost certificate for biodegradable film from TÜV Austria agency.

We work with external consultants to have the latest information in the field of the environment. We follow the valid legislation of the Czech Republic, as well as international standards. We strive to make our planet the same or even better home for future generations. We lead our employees to the correct sorting of waste. Every year we monitor the amount of municipal waste produced and the goal is to constantly reduce it. We use natural resources in a gentle way.



13. Relationships in the workplace and outside the company

Both in relations among employees and in relation to the public, employees of PEBAL Group a.s. are obliged to be polite and helpful, not to favour anyone and to observe the principle of equal and fair treatment.

Every employee is obliged to respect the human rights of other employees and to strive for a work environment in which there is no discrimination and human rights are not violated. Sexual and other harassment is undesirable and prohibited behaviour that undermines the integrity of employee relationships and is incompatible with a fair work environment. Any use of harsh words, finger-pointing, humiliation, discrimination, violence and mental or physical harassment is prohibited.

Through joint efforts, employees create an atmosphere of cooperation and trust in work teams. Employees are obliged to prevent conflicts in the workplace. They resolve potential work and mutual conflicts objectively, cultivated and openly with their immediate supervisors and respect their decisions.

Managers apply an equal approach to employees with an emphasis on evaluation according to the work performed. They oversee the use of the expertise of all subordinate employees and their full integration into the work team.



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