



Industrial Pack Code of Conduct Letter

Code of Conduct Letter describes the ethical business standards and sets down the behavior which Industrial Pack expects from its suppliers, subcontractors, consultants, service providers, agents and business partners (hereinafter referred to as “Supplier”).

The Supplier shall at all times during the term of agreement(s) with Industrial Pack comply with this Code of Conduct Letter in all countries they operate.

Each supplier is responsible for ensuring that their employees, agents and sub-suppliers understand and comply with Industrial Pack Code of Conduct Letter.

The Industrial Pack Code of Conduct Letter must be held as the guidelines for every business relationship with Industrial Pack becoming an integral part of each purchasing agreement concerning goods and/or services.

The Industrial Pack Code of Conduct Letter is not intended to be a static instrument. It will be continuously developed and adapted to the ever-changing legal and economic environments that affect the ways that we conduct our business.

In cases of conflict between relevant laws and the principles described in this Industrial Pack Code of Conduct Letter, the highest standard shall prevail to ensure sustainable operations.

Suppliers guarantee that they and their employees, subcontractors and suppliers will act in accordance with the rules set out below.

Supplier Code of Conduct

LEGAL PRACTICES

- **Legal Compliance**

Act in accordance and ensure full compliance with all laws and regulations and the body of relevant legislation that governs them.



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- **Fair Business, Advertising and Competition**

The Supplier shall under no circumstances cause or be part of any breach of general or special competition regulations, such as illegal cooperation on pricing, illegal market sharing or any other behavior that is in breach of relevant competition laws.

Materials Not Obtained Through Illegal and Unethical Ways

Suppliers shall evaluate the origin or source of their materials throughout their supply chains to verify that they have not been obtained through any illegal and unethical ways.

- **Anti-corruption**

Supplier shall comply with all applicable anti-bribery laws while conducting business on behalf of Industrial Pack.

Supplier shall not engage in any form of bribery, kickbacks, corruption, extortion, money laundering or embezzlement. Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted.

This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, direct the hiring of any person or otherwise gain an improper advantage.

WORKING CONDITIONS

- **Freely Chosen Employment**

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, trafficked or slave labor shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

- **Avoidance of Child Labor**

Suppliers must comply with the applicable local laws with regard to the minimum hiring age for employees.

- **Humane Treatment**

Suppliers shall treat all employees with respect void of any harsh or inhumane treatment, such as sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse of workers, or unreasonable restrictions at work.



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- **Wages and Benefits**

Compensation paid to workers shall comply with all applicable laws and regulations. Suppliers shall also provide to workers all legally mandated benefits. Furthermore, deductions from wages cannot be used as a disciplinary measure against workers.

- **Working Hours**

Working weeks and hours must not exceed the maximum, as established by local laws and regulations.

- **Non-Discrimination**

Suppliers shall be committed to creating a workforce free of harassment and unlawful discrimination of race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices, such as promotions, rewards, access to training.

- **Freedom of Unionization and Collective Bargaining**

Employees of suppliers are free to join legal organizations based on their own choices. Suppliers shall bestow and respect their employees' right of association and collective bargaining. Employees shall not be threatened or harassed as they join such organizations.

- **Reporting, Protection of Identity and Non-Retaliation**

Supplier shall have adequate systems to address employee concerns and grievances. Those systems must protect confidentiality, allow anonymity of reporting unless prohibited by law, and protect employees against retaliation.

BUSSINESS ETHICS

- **Business Integrity**

The highest standards of integrity are expected in all business interactions. Suppliers shall prohibit any and all forms of corruption, extortion, embezzlement, bribery, kickbacks, gifts including any payments or other forms of benefits conferred on any government official for the purpose of influencing decision making in violation of law. Any other means of obtaining undue or improper advantage are not to be offered or accepted. Monitoring and enforcement procedures shall be implemented to ensure compliance.



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- **Traceability of Production**

Suppliers cannot subcontract any business without prior written approval of Industrial Pack and are obligated to have a transparent and honest attitude during all production and sourcing stages.

- **Documentation and Records**

The supplier shall create, save and store all information related to the business correctly and in complete harmony with all requirements of applicable laws and regulations. At meetings with representatives of regulatory bodies and officials, the supplier shall be honest and ingenious.

- **Privacy**

Supplier shall protect the personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

- **Confidentiality and Protection of Trade Secrets**

Documents, business and technical information provided by Industrial Pack to the supplier are defined as “Confidential Information”. The supplier shall keep all information, methods that provide competitive advantage or ideas, practices, methods, inventions, designs, works etc. not yet known in the industry (“Trade Secret” or “Confidential Information”) confidential, and shall not explain to third parties without a written consent of Industrial Pack.

- **Intellectual Property Rights**

Industrial Pack does not entitle the supplier with licenses, patents, industrial designs or copyrights. The supplier must pay all costs, losses and additional expenses, including fines, of the parties (Industrial Pack other suppliers, distributors and customers) who incur losses due to breach of intellectual property rights as a result of any reason caused by the supplier.

- **Conflict of Interest**

The supplier shall avoid acts that cause inconvenience or conflict of interest.

- **Accepting and giving gifts**

Apart from souvenirs/promotions given in accordance with customs of trade, any gift sent by the supplier that give an impression of infraction of rules, may cause or be perceived as dependency shall not be accepted.



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HEALTH & SAFETY

- **Occupational Safety**

Suppliers shall eliminate physical and safety hazards and take precautionary measures that guard against accidents and occupational diseases. These hazards shall be controlled through proper design, engineering/administrative controls, preventative maintenance, safe work procedures, and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers shall be provided appropriate and well-maintained personal protective equipment.

- **Health and Safety Permits**

Supplier will obtain, keep up to date and comply with all necessary health and safety permits.

- **Occupational Health and Safety Management**

Supplier will identify, assess and manage occupational health and safety hazards through a prioritized hazard elimination, substitution, engineering control, administrative control process and / or personal protective equipment.

- **Industrial Hygiene**

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards.

- **Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

- **Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.



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- **Emergency Preparedness**

Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures.

- **Occupational Injury and Illness**

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and take corrective actions to eliminate their causes; and e) facilitate the return of workers to work.

- **Event Management**

The supplier will have a system for employees to report health and safety incidents and near misses, as well as a system for investigating, monitoring and managing such notifications. Supplier will implement corrective action plans to reduce risks, provide necessary medical treatment and support employee return to work.

- **Sanitation, Food, and Housing**

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the suppliers or a third-party agent – if any – are to be maintained clean and safe, and provided with appropriate emergency egress and adequate heat and ventilation and reasonable personal space, entry and exit privileges.

- **Health and Safety Communication**

The supplier will provide appropriate training for employees in their native language on workplace health and safety. Health and safety information will be posted in a visible place in the facility.

ENVIRONMENTAL

- **Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and suppliers shall follow their operational and reporting requirements.

- **Hazardous Substances**



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Suppliers shall comply with Industrial Pack 's environmental and quality management standards. Also, they shall identify chemical and other materials that pose a safety hazard if released to the environment and manage the safe handling, movement, storage, use, recycling, reuse, and disposal of these substances.

- **Solid Waste and Wastewater**

Suppliers shall identify, monitor, control and treat solid waste and wastewater generated from operations, industrial processes, and sanitation facilities, as required by applicable laws and regulations prior to discharge.

- **Hazardous Waste Management**

To ensure safe handling, movement, storage, recycling, reuse and disposal, suppliers will identify and manage substances that pose a hazard if released to the environment and at a minimum, comply with applicable labeling laws and regulations for recycling and disposal.

- **Non-Hazardous Waste Management**

Supplier shall identify, manage, reduce and responsibly dispose of or recycle non-hazardous waste.

- **Flood Water Management**

Supplier shall prevent contamination of runoff floodwater. Supplier will prevent illegal dumping and dumping of manholes, mains water reservoirs or resources.

- **Airborne Emissions Management**

Whether through conservation, use of clean energy or other measures Supplier; shall identify, manage, reduce and responsibly control air emissions from its operations that pose an environmental risk and routinely monitor the performance of air emission control systems and regularly measure greenhouse gas emissions and set targets and also monitor progress and reduce emissions.

- **Noise Management**

Supplier shall identify, control, monitor and reduce noise generated by the facility that affects that affects boundary noise levels

- **Resource Consumption Management**

Supplier shall regularly measure, set targets, monitor progress and reduce consumption of fossil fuels, water, hazardous materials and natural resources through conservation, reuse, recycling, substitution or other measures.



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- **Product Content Restrictions**

Supplier must comply with all laws, regulations and customer requirements regarding the prohibition or restriction of certain substances, including marking for recovery or disposal. Compliance with IMDS and “Conflict Minerals” reporting requirements is essential.

Industrial Pack Ltd.

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