

CODE OF CONDUCT

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1. ABOUT US

We, Cartonplast Group are the leading provider of reusable plastic layer pads on a rental base. They are used for the transportation of glass-, cans and PET-containers to provide hygienically safe and efficient transport in the food, beverage, pharmaceutical and cosmetic industries. We serve our customers out of 18 service and logistic centres with the aim to keep our worldwide frontrunner position in the industry. The company is headquartered in Dietzenbach, Germany. Our Code of Conduct contains the fundamental principles and rules governing the way we act within our company and in relation to third parties.

2. OUR VALUES

WE ARE PASSIONATE ABOUT CUSTOMERS

As a service provider we strive to create and maintain long term and trusting customer relationships. We seek their satisfaction and pursue to meet their expectations while respecting their values.

WE ARE PERFORMANCE DRIVEN

Market leader position requires best performance on our day-to-day duties.

WE ARE SUPPLY CHAIN MASTERS, WE DELIVER QUALITY PRODUCTS

Our position in the food and beverage production supply chain requires high quality and food safe transport packaging.

WE RESPECT AND VALUE DIVERSITY

Similarities and differences among employees in terms of age, cultural background, physical abilities, race, religion, gender, linguistic differences and socio-economic status are respected at any time within our organization.

WE VALUE PEOPLE

Our employees are the most valuable of all our assets. We are people oriented, seeking motivation, professional development and remuneration that is based on performance and the achievement of goals.

WE NEVER COMPROMISE SAFETY

For our customers as well as for our employees we pay strict attention to maintain the CPL Group`s Work-Safety-Rules in everything we do.

WE RESPECT THE ENVIRONMENT

The driving force for improvements in our company are not only economic benefits, but also a commitment to meet all environmental rules and regulations. We protect our environment through sustainable products and sound management practices.

3. OUR ETHICAL PRINCIPLE

We are committed to obey the laws and regulations of the legal systems within which we are operating in addition to applicable CPL Group`s policies. Violations of the law must be avoided under all circumstances.

The personal dignity, privacy and personal rights of each individual must be respected. We do not tolerate discrimination against anyone on the basis of ethnic background, culture, religion, age, disability, race, sexual identity, world view and gender. Harassment or offensive behaviour, whether sexual or otherwise personal are strictly denied.

4. ENVIRONMENT

Protecting the environment and conserving natural resources are high priorities for our company. Through management leadership and employee commitment CPL Group strives to conduct its operations in a manner, which is safe for the environment and continually improves environmental performance.

5. HEALTH AND SAFETY, PREVENTION OF OCCUPATIONAL HAZARDS

The health and safety of our employees at the workplace has the highest priority for CPL Group. This includes the maintenance and constant improvement of standards in the areas of operational safety, labour and health protection. Every field of work and its surroundings at CPL Group must satisfy these safety standards.



6. OUR EMPLOYEES

Apart from the laws and regulations of individual countries there is a number of important treaties and recommendations of international organisations which constitute important guidelines for the conduct of employees of companies doing business at the international level.

CPL Group supports these recommendations, in particular the 1948 Universal Declaration of the Human Rights (UN) and the 1950 European Convention for the Protection of Human Rights and Fundamental Freedoms.

Furthermore, we are honouring the different declarations of the International Labour Organization (ILO) concerning elimination of child labour, abolishment of forced labour, anti-discrimination policies, freedom of association and the right to collective bargaining.

Our success is based to a significant extent on the know-how and the commitment of our employees. We are therefore committed to invest in the development and qualifications of our employees, and to promote talent within the limits of CPL Groups' economic resources and requirements.

7. BUSINESS PARTNERS AND THIRD PARTIES

In CPL Group, our actions in the market are based on the principles of free competition and equal opportunity. We rule out any action that is aimed at obtaining unfair or illegal profit, benefit or advantage with regard to our customers, suppliers, competitors or the other market players.

That is why such practices are totally prohibited. We avoid any type of conduct or procedure that violates the principles of fair competition, which includes collusion

with competitors, provisions that exclude people or groups of people, the use of market position to exercise unfair pressure on competitors and suppliers, and fraudulent conduct that is aimed at deceiving competition. In addition, we undertake to deal fairly with anyone that interacts with our Company.

At CPL Group, offering or accepting a bribe, in any form, to or from any person in either the public or private sectors, is prohibited.

Reasonable and bona fide hospitality and promotional or other business expenditures, which seek to maintain cordial relations or present products or services, are recognized as a legitimate part of doing business.

In CPL Group we are aware that exchanging gifts and invitations can contribute to building or improving good business relationships. However, such activities may also cause personal and professional conflicts of interest. Furthermore, some gifts and certain invitations can unduly influence the recipient (or seem to influence them); they may even be perceived as bribes or corruptive acts, which are expressly prohibited.

Our Company does not donate money, assets nor services to political parties.

In CPL Group we particularly value those suppliers that share the principles that inspired this Code. Therefore, the relationship we have with any of our suppliers must be based on exclusively objective criteria, in particular with regard to quality, truthfulness and competitive prices, as well as regarding compliance with environmental, social and corporate management standards. CPL Group expects its suppliers to act in accordance with the Base Code of Ethical Trading Initiative.

Our customers are the center of our business that is why we direct our work at satisfying their needs and interests, with the sole objective of establishing long lasting relationships with them that are based on reciprocal value and mutual trust.

We must inform all our customers impartially and accurately regarding the products we supply and the services we render and regarding whether or not they are suitable to each of our customer's expectations and needs. We strive to avoid any conduct that could imply deceit or withholding of relevant information, as well as and we strive to avoid taking part in unfair practices.

Our Company denies the use of any corrupt practices to get customers.

8. CONFLICTS OF INTERESTS

In our daily business we may be faced with situations in which a decision that is in the best interest of the company competes with our personal interests. A conflict of interest can make it difficult for an individual to make impartial decisions that are in the best interest of the company.

9. OUR PROPERTY AND INFORMATION

CPL Group maintains a variety of appliances, equipment and other working materials in its operating facilities and offices. We are committed to treat this property with care and in the intended manner. CPL Groups' property may not be used for private purposes or removed from the company premises without express approval.

We implemented measures and procedures to protect all sensitive information concerning our employees, business partners and third parties with special care and in accordance with legal and contractual requirements as well. The obligation to maintain confidentiality extends beyond the termination of the relevant relationship as well since the disclosure of confidential information could cause harm to our business or customers, no matter when it is disclosed.

CPL Group complies with all applicable laws that prohibit money laundering and take all measures that are necessary and appropriate to prevent the proceeds of crime being laundered. Money laundering is the process by which person or groups try to conceal the proceeds of illegal activities or try to make the sources of illegal funds look legitimate. We ensure to obtain sufficient information about the business environment of the contracting party, the contracting party itself and the transactions that the contracting party intends to pursue ("know your customer"). Employees are encouraged to be vigilant for financial transactions which may signal a problem and to report any concerns if they see or suspect an activity or transaction that is outside of the typical process.



10. EXPORT CONTROL AND CUSTOMS

Trade in goods, services and technologies is regulated by national and international laws. In the cross-border sale and purchase of products, services and technologies, CPL Group is committed to comply with the foreign trade and customs laws. All exports and imports must be declared correctly and transparently to the customs authorities. Lawful conduct of export and import business must be evaluated in advance by the individuals responsible for foreign trade on the basis of the applicable regulations.

11. WHISTLE-BLOWER SYSTEM

Our Company implemented a whistle-blower system which provides means for all employees to report suspicious or severe misconduct which are violations against legal and statutory regulations as well as the Code of Conduct and other internal rules.