

INTRODUCTION

INDEVCO North America Inc. (“INDEVCO”) and all related business units outline our commitment to environmental sustainability and social responsibility in this ‘Supplier Code of Conduct’ and seek to do business with suppliers who share a similar commitment. Suppliers may agree on further standards in supply agreements with any INDEVCO North America business unit responsible for procurement activities.

We have created this Supplier Code of Conduct (“Code”) to outline what we expect from our suppliers with respect to labor and employment rights, health and safety, business ethics, product quality, environment, security and privacy, and global trade controls. Suppliers are expected to adhere to this Code and operate in full compliance with all applicable laws and regulations. When local laws and regulations are less restrictive than this Code, we expect adherence to our principles.

OUR MISSION

The mission of INDEVCO North America is to enhance business—and enrich lives—through building envelope systems and packaging solutions that protect people, products, communities, and our environment.

OUR VALUES

Core Values

INDEVCO is committed to maintaining and developing our corporate culture doing business in such a way that respects the 7 core values which have guided our group’s business since its foundation.

Our success is tightly woven into the core values which influence the way “we do” our job and the way “we think” about managing and leading our business. In a true sense, the core values are vital, essential, lasting and intended to be acted upon.

INDEVCO expects our people to embrace the 7 core values in business and personal relationships:

Entrepreneurial Drive

Displaying self-motivation in taking calculated risks and initiatives of a significant strategic contribution

Family Spirit

Creating a feeling of belonging, supporting, and caring for each other, and being there in times of need

Hard Work

Going the extra mile to overcome challenges, get things done, and achieve business objectives

Honesty

Acting and interacting with integrity, transparency, and credibility with self and towards others

Modesty

Behaving and communicating with humility, sincerity, and respect towards others

Precision

Working to high standards of accuracy without losing sight of the big picture

Servant Leadership

Sacrificing self-interest for the good of the group and serving others equally

ETHICS & BUSINESS CONDUCT

Anti-Corruption & Bribery

INDEVCO expects its suppliers to comply with anti-corruption and fair competition laws and regulations to prevent engaging in activities that could eliminate, diminish, or discourage competition.

Suppliers must not engage in illegal payments or corruption or tolerate the offer of gifts, favors or entertainment where they are intended — or appear intended — to obligate the receiver. Suppliers should not participate in extortion, fraud, larceny, bribery, or kickbacks. A supplier should use every effort to legally understand and determine when it is dealing with a government official and when a payment may be legitimate rather than a bribe.

Conflicts of Interest

Suppliers must disclose to INDEVCO any potential conflict of interest, such as when one of their employees (or someone close to the employee) has a relationship with an INDEVCO employee who can make decisions that will affect the supplier's business — or when an INDEVCO employee has any kind of interest in the supplier's business.

INDEVCO Code of Conduct instructs our employees and members of the Company's Board of Directors to avoid conflicts of interest and any gifts and/or entertainment when there is any chance that the purpose is to improperly influence the recipient; violate the Company's Code (available for review on our website www.indevconorthamerica.com); or violate the law. Suppliers will familiarize themselves with this policy and avoid contributing to a conflict of interest or the appearance of a conflict of

interest or impropriety. Any involvement by a Supplier in any conflict may be grounds for a termination of business relationship.

Gifts & Entertainment

Suppliers should never offer, promise, authorize, make, solicit or accept bribes, kickbacks or other improper payments, regardless of local practice or perceived customs. This is applicable to interactions with any persons, whether in the private or public sector. Suppliers should not provide or receive extravagant meals, gifts, or entertainment. Values should be reasonable and modest and within acceptable limits appropriate to the business relationship and be made in a transparent manner. Suppliers must be especially aware of interactions with governance, including employees of state-owned enterprises that can present heightened risk and not make facilitating payments to expedite or secure non-discretionary routine governmental processes.

Bribes or inappropriate, lavish or repeated gifts to INDEVCO employees are forbidden, regardless of local custom. Furthermore, suppliers must not offer entertainment or gifts to government officials — or make direct or indirect political contributions — on INDEVCO's behalf.

Antitrust, Sales Practices & Competitive Information

Suppliers should not engage in transactions that violate antitrust or competition laws. Such transactions may include but not be limited to participating in cartels, price fixing, bid rigging or data sharing that could prejudice fair competition within the marketplace.

Suppliers should not violate antitrust and competition laws in the countries in which they operate. Suppliers must operate in fair competition and shall not engage in price fixing, price discrimination, or unfair trade practices that transgress federal or state law.

Social Responsibility

Suppliers must operate in an ethical manner and take into account the environment when making business decisions. Supplier is encouraged to develop or adapt existing business practices in order to improve their employee work environment, the community and society in general.

Inclusion & Diversity

INDEVCO believes in a fair, respectful, inclusive and safe work environment, where diversity is valued and where unlawful discrimination, violence, bullying, and harassment in any form are not tolerated.

We believe in the power of diversity and are committed to actively creating an environment where each team member feels empowered to learn, grow, and maximize his/her personal contribution. Celebrating the similarities and differences that shape each of us encourages innovative thinking and drives the sustainable, competitive advantage that will help us grow and prosper for decades to come. We seek suppliers who are inclusive and ensure that their employees and other stakeholders are always treated with dignity and respect.

Accountability

Suppliers shall adhere to terms and conditions discussed in this Code, including but not limited to decisions based on delivery time, warehousing services, shipping costs, etc. Suppliers should take full responsibility when they breach agreements.

WORKPLACE, LABOR & EMPLOYMENT RIGHTS

Prohibition on Child Labor

Suppliers should not employ individuals under the age of 18 or below the legal minimum age of the country in which they operate, whichever is lower.

Human Trafficking and Forced Labor

Suppliers shall not force, involuntarily imprison, or bond labor. Employment shall be freely chosen.

Suppliers shall not use forced labor or employer workers procured through the use of human trafficking and must adhere to all laws and regulations designed to prevent such practices. Such laws and regulations include the Trafficking Victims Protection Act (TVPA) of 2000.

Freedom of Association & Collective Bargaining

Suppliers must ensure a work environment respectful of an employee's legal right to associate freely with lawful associations, labor unions, or work councils and engage in collective bargaining. Suppliers shall ensure not to discriminate, disadvantage, or retaliate against employees who choose to exercise these rights.

Suppliers shall honor employee rights to bargain collectively regarding terms and conditions of employment and refrain from violating collective bargaining rights within the country in which they operate.

Fair Wages & Benefits

Suppliers must provide fair compensation and work benefits to employees meeting, at minimum, national legal requirements and/or industry benchmark standards. Wages and benefits shall effectively reflect job description and employee scope of responsibility. All employees should be clearly informed of and agree with employment conditions prior to starting work.

Suppliers shall pay employees not less than the minimum wage as defined by local ordinances and provide at least the minimum level of benefits stipulated by local laws and regulations.

Employees must be paid for all hours worked and, if applicable, receive overtime compensation as legally required within the country and local jurisdiction in which the work is performed.

No employee shall receive deductions from wages unless he or she has consented to do so in writing and in accordance with local law.

Non-Discrimination & Fair Treatment

Suppliers shall not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on race, social group, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Suppliers shall prohibit violations of human rights. Suppliers shall ensure all employees work in an environment free from physical and verbal abuse, harsh disciplinary actions, sexual harassment, discrimination, and all forms of intimidation.

HEALTH & SAFETY

Training & Equipment

Employees must receive adequate health and safety training conducted annually as mandated by local law. Suppliers must provide employees and independent contractors with personal protective equipment that will guard them from exposure to hazardous substances. Suppliers must ensure that personal protective equipment meets specifications of local laws in the country in which they operate.

Emergency Prevention & Response

Suppliers must respond to and investigate reported safety-related incidents or complaints. Suppliers are expected to maintain incident and close call reporting documentation as required by regulation.

Suppliers need to identify potential emergency situations, implement preventative measures and be prepared to execute emergency response plans.

EHS Compliance & Management Systems

Suppliers shall comply with all laws and regulations pertaining to environment, health and safety (EHS) practices. Suppliers should utilize EHS management systems in line with industry practices. EHS management systems and best practices may include, but not be limited to, preventive maintenance procedures, use of personal protective equipment, training and compliance self-assessments and audits. Suppliers should maintain all required permits and records relating to EHS practices within the country within which they operate and retain those records for the required duration of time. Compliance self-assessment or audits should be completed in line with industry best practices and audit records maintained for a minimum of three (3) years or the duration required by regulation, whichever is longer.

Supplier shall comply with all environmental laws and regulations. Supplier shall have applicable environmental permits and registrations for the business sector in which the Supplier operates.

Permits and registrations shall be maintained, kept current, and made available to INDEVCO for inspection on request.

PRODUCT QUALITY

Product Quality & Continuous Improvement

Supplier products and services should meet quality and safety standards required by applicable law, perform as promised for our intended purpose and meet the quality requirements and specifications set forth by INDEVCO. Supplier shall produce and maintain a Quality Management System (QMS) and Product Safety Management System that is approved by a trustworthy third-party registrar and shall be able to deliver documentation of quality certificates upon request.

Suppliers are expected to remain competitive in the industry and should focus on continuous improvement efforts to enhance their business effectiveness. Efforts should involve increasing customer satisfaction through reduced cost, quicker response times, and improved product quality.

Certifications

Suppliers must acquire required environmental permits, approvals, registrations, and certifications. Suppliers must maintain requirements and keep these approvals up to date.

Suppliers will supply INDEVCO a Certificate of Conformance (COC) or Certificate of Analysis (COA) for each batch indicating conformance to specifications and additional information and data, if available, upon request.

Obligation to Report Concerns & Non-Conformities

Suppliers shall report quality issues, concerns, or non-conformities that were supplied to INDEVCO in error, or in the event that a latent issue, concern, or non-conformity was detected after the material was shipped. INDEVCO should be notified within 24 hours of compliant with a description of data needed to begin investigation. Suppliers will further provide, in writing, within 10 business days, the cause and corrective action for any confirmed product quality event; final investigation and report to be provided within 30 business days.

Obligation to Communicate Changes

Suppliers are obligated to communicate changes to their product, process, manufacturing location, and/or service with INDEVCO, including but not limited to: specifications or any portion or component of the products; specifications or scope of the services; storage conditions; manufacturing processes, procedures, or equipment used to manufacture the products; raw materials; and location of manufacture or company ownership. The general guidelines are that minor changes require

notification and major changes require prior approval, such notification or approval to occur at least 90 days prior.

Audits

Suppliers shall allow INDEVCO to conduct quality and compliance systems audits at Supplier’s facility. Supplier shall provide access to information pertaining to personnel, facilities, records, and control documents relevant to the supply of products and raw materials to INDEVCO.

ENVIRONMENT

Sustainable Forestry

Suppliers of paper products and paperboard should provide FSC Chain of Custody and Fiber Sourcing certifications required when requested.

Wastewater & Solid Waste

Suppliers must develop and implement systematic approach to identify, manage, reduce and responsibly dispose of or recycle wastewater and non-hazardous solid waste. Suppliers shall monitor produced wastewater and solid waste generated from relevant operations, industrial processes and sanitation facilities. Suppliers shall seek to recycle and re-use waste, where possible, to improve production efficiency.

Pollution Prevention & Resource Reduction

Suppliers are encouraged to track and analyze energy use and identify opportunities to increase efficiencies. Suppliers are encouraged to apply strategies to develop carbon footprint reduction strategies. Suppliers are encouraged to provide employees with recycling opportunities.

Suppliers should work to reduce the environmental impacts of their operations including natural resource consumption, material sourcing, waste generation, wastewater discharges, and air emissions. Suppliers must prevent accidental releases of hazardous materials into the environment that would cause adverse environmental impacts on the local community.

SECURITY & PRIVACY

Intellectual Property

Suppliers must protect intellectual property rights, trade secrets and proprietary information of INDEVCO and member companies. They shall also protect personally identifiable information that they keep for INDEVCO from unauthorized access, destruction, changes, use and disclosure.

Supplier should respect intellectual property rights and shall maintain controls to safeguard INDEVCO's name, logo, trademarks, confidential information, and other intellectual property against unauthorized use, modification, and damage.

Data Privacy

Suppliers should have an established information security system to protect INDEVCO's information – and the information of its customers – from being shared, changed, or destroyed.

Suppliers shall take appropriate steps to protect proprietary or confidential information, including employee information, customer data, intellectual property and trade secrets.

Disclosure of Information

Suppliers shall accurately record and disclose information regarding their business activities, company structure, financial situation, and business performance in accordance with prevailing industry practices and applicable laws and regulations.

GLOBAL TRADE AND COMPLIANCE

Export Controls

Suppliers shall not directly or indirectly provide to INDEVCO any material or service from a country, person, or entity that is subject to U.S. or other regional, unilateral, and multilateral regulations that restrict transactions with specific foreign entities, persons, or countries (often referred to as denied, debarred, and/or restricted parties). Examples of entities and persons include but are not limited to, terrorists, organizations that fund terrorists, and/or parties guilty of trade violations.

Countries that maintain consolidated lists of financial sanctions targets include the United States, the European Union, Canada, the United Kingdom, and Japan. In the United States, government organizations responsible for enforcing trade sanctions and embargoes include the U.S. Department of the Treasury Office of Foreign Assets Control (OFAC), U.S. Customs and Border Protection, the U.S. Commerce Department Bureau of Industry and Security (BIS), and the U.S. Department of State.

Suppliers should implement due diligence compliance practices to screen their employees, customers, suppliers, Suppliers, agents and other business associates, including all parties in each transaction such as banks, insurance companies, shipping lines, and freight forwarders to ensure compliance with applicable laws and regulations concerning embargoes and sanctions. Suppliers should be familiar with the Customs-Trade Partnership Against Terrorism (C-TPAT) requirements.

Trade Regulations

Suppliers must comply with the trade regulation laws of the country or legal subdivision within which they operate.

BUSINESS AGREEMENT

INDEVCO North America Supplier Code of Conduct is a vital component our partnerships with suppliers. As such, suppliers will be asked to affirm that they support the Code.

Suppliers shall adhere to terms and conditions discussed in this Code, including but not limited to decisions based on delivery time, warehousing services, shipping costs, etc. Suppliers shall take full responsibility when they breach agreements.

Frequently Asked Questions

Why do we have a Supplier Code of Conduct?

The Supplier Code of Conduct outlines INDEVCO’s expectations of our suppliers in relation to labor and employment rights, health and safety, ethics and social responsibility, and global trade practices to be sure that suppliers are clear about our expectations and ensure that suppliers conduct business in line with our company’s principles and values.

How does INDEVCO monitor the Code?

INDEVCO expects its suppliers to establish a management system that supports the content of this code and monitors/records regulatory compliance. Additionally, INDEVCO may conduct onsite audits to ensure compliance to this Code.

What happens if suppliers fails to comply with the Code?

If a supplier fails to meet the standards set forth in this Code, INDEVCO will inform the supplier of the area(s) that require improvement. Supplier would then be required to submit an acceptable corrective action plan. If the plan is approved, supplier will be given a set period of time to resolve the area(s) of concern. Non-compliance may be grounds for INDEVCO to void or terminate contractual obligations with a supplier.

Who should I contact with additional questions?

Should you have additional questions about this Supplier Code of Conduct, please contact your Purchasing Representative or email your questions to supplier@INDEVCO-NA.com.