

SUPPLIER CODE OF CONDUCT

This Tekni-Plex, Inc. Supplier Code of Conduct (Code) sets forth the guidelines and expectations with respect to key areas of responsible sourcing for all vendors and suppliers doing business with Tekni-Plex, Inc. and its direct and indirect subsidiaries (collectively, "TPI"). This code supplements, but does not supersede, any rights or obligations established by any purchase order or other agreement we may have with any supply partner (each "Supplier"). We ask our supply partners to take reasonable steps to ensure the Tekni-Plex, Inc. Supplier Code of Conduct is communicated throughout Supplier's organization and to make this code available to Supplier's employees and supply chain partners.

- 1. Unless otherwise required or prohibited by applicable laws, Supplier represents and warrants that Supplier:
 - a. does not employ workers younger than 16 years of age and complies with all legal requirements for authorized young workers, particularly those pertaining to hours of work, wages, and working conditions;
 - b. does not use forced labor, whether prison, bonded, indentured or otherwise and will not engage in or support trafficking in human beings or require forced overtime:
 - c. operates in full compliance with all compulsory laws and regulations of the countries in which Supplier operates:
 - d. provides a safe work environment, abiding by all local laws and regulations, and effectively manages health and safety, so that health and safety risks, issues, incidents and non-compliance are identified and addressed in order to provide adequate facilities to ensure the health and well-being of its workforce;
 - e. shall ensure that employment of its employees (including hiring, remuneration, benefits, advancement, termination and retirement) is based on ability and not on race, color, religion, sex, age, national origin, disability, pregnancy, marital or partnership status, sexual orientation, gender identity, veteran's status, or any other personal characteristics protected by law in each locality does not discriminate against any employees on any ground (including race, sexual orientation, religion, disability or gender and that Supplier is in compliance with all applicable country and local laws governing non-discrimination in employment;















- f. does not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse and does not use cruel or abusive disciplinary practices in the workplace;
- g. pays each employee at least the minimum wage, the legally mandated overtime premium for all hours worked, does not impose monetary fines for poor performance and ensures that all legally mandated benefits are being provided and that there are no illegal deductions for benefits;
- h. complies with the laws on working hours and employment rights in the countries in which it operates;
- i. is respectful of its employees right to join and form independent trade unions and freedom of association.
- 2. Supplier agrees that it is responsible for controlling its own supply chain and that it shall encourage compliance with ethical standards and human rights by any subsequent supplier of goods and services used by Supplier when performing its obligations to TPI.
- 3. Supplier shall notify TPI prior to making any significant changes to the material(s) supplied or significant changes or deviations involving testing, testing methods, inspections, pre-sampling and post-sampling used in connection with supplying products or material to TPI.
- 4. Supplier shall comply with all local environmental laws and regulations applicable to their operations. In addition, Suppliers are encouraged to have environmental policies and environmental management systems containing goals with targets focused on the continuous improvement of overall environmental performance.
- 5. Supplier shall ensure that it has ethical and human rights policies and an appropriate complaints procedure to deal with any breaches of such policies. In the case of any complaints, Supplier shall report the alleged complaint and proposed remedy to TPI.
- 6. Supplier shall conduct business with honesty and integrity and demonstrate the highest standards of business ethics. Supplier shall not engage in bribery, corruption, or other unethical or illegal practices whether in dealings with government officials (which includes government employees or officers at any level, employees or officers at government-controlled or owned entities, employees or officers of public international organizations, and political officials or candidates or anyone acting on such a person's behalf), political parties or others, including individuals in the private sector. This includes, directly or indirectly, paying, giving, offering, promising, or















authorizing money or anything of value to anyone to seek to obtain an undue or improper advantage. This also includes any unethical business activities or arrangements between Supplier and any TPI employee or any other company or individual.

- 7. Supplier shall source its raw materials, goods and services with the same fundamental support of human rights, labor, health and safety, environment, and ethics -- unbounded by specific materials or locations, and develop and/or maintain the capability to identify all materials contained in its products for TPI. Where applicable, we expect our suppliers to take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.
- 8. Supplier will not, directly or indirectly, undertake any act or omission, whether alone or together with any other person or entity, which may contravene any applicable competition/anti-trust legislation, regulations and/or rules.
- 9. Supplier shall record and report information accurately and honestly and will not hide. fail to record, or make false entries. All books, records and accounts must accurately reflect transactions, payments and events, and conform to generally accepted accounting principles, good internal controls and all applicable laws and regulations.
- 10. Supplier acknowledges that TPI uses a web based compliance tool to screen its suppliers for compliance with laws and regulations, including but not limited to applicable trade control laws and regulations, such as Export Administration Regulations and regulations administered by the U.S. Department of the Treasury's Office of Foreign Assets Control and other similar laws. Supplier hereby consents to such ongoing screening.
- 11. Supplier acknowledges that TPI has the right to audit Supplier's compliance with this Supplier Code of Conduct.













