



Code of Conduct

A message from our Chairman

We pride ourselves on our ethics

We operate in an increasingly uncertain and complex world, yet one thing remains constant, and that is our high ethical standards of business integrity.

It is through both our Winning Traits and Behaviours, and the success of our much-loved brands that we have grown our global business; and it is our integrity, respect for our customers, consumers, people and planet, together with our one pladis approach that will shape our future.

Our pladis Code of Conduct sets out a clear standard of behaviours that each of us needs to be aware of, and adhere to, at all times.

Thank you for safeguarding our strong reputation and for your commitment to always doing the right thing.



Murat Ülker
Chairman

A message from our CEO

Doing what's right

pladis is a company founded on over hundreds of years of heritage and culture, and we always seek to celebrate all that makes us unique. At the same time, as a global business, we respect a set of shared values and a commitment to always doing the right thing, no matter where in the world we operate from. A commitment to ethics is our unwavering compass.

Our Code of Conduct sets out the behavioural standards we ask our business partners and our people to follow. Indeed, we expect everyone at pladis to understand and adhere to our Code of Conduct.

If you have any questions relating to the Code of Conduct, or concerns about a potential situation, then please use the pladis ethics hotline to voice your concerns. We operate under the guiding principles of trust and transparency and it's in all our interests to fiercely protect and nurture the trusted reputation we have worked so hard to build.

A handwritten signature in black ink, appearing to read "Salman Amin". The signature is written in a cursive style with a long, sweeping underline.

Salman Amin

Chief Executive Officer, pladis

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Our Code guides us

About pladis and our Code

At pladis, we take our strength from our rich heritage as a family business with well-established beliefs at our core. Our central idea to 'Promise Happiness to the World with Every Bite' is the reason we exist. It's our Purpose.

When it comes to delivering on our purpose, ethical behaviour at pladis is non-negotiable. Each member of the pladis family should be able to speak their mind freely, behave within the framework of universal ethics, laws and regulations, make decisions responsibly, and accept accountability for their actions.

pladis operates all around the world and we are proud of our reputation for acting fairly and ethically wherever we do business. The pladis Code of Conduct (the Code) covers key areas of conduct and provides guidance on how you should deal with certain issues and situations that may arise in your day-to-day duties, tasks and responsibilities.

We recognise that no Code of Conduct can cover every possible situation and so, in addition to this Code, there may be policies and rules in your business operation that will still apply.

Business ethics

Business ethics are at the heart of how we do business, wherever in the world we operate. We must always refer to local laws, ethical principles, and our Code when in doubt. We do not assume these principles are applied differently in different geographies and/or cultures. Business ethics are universal.

Who should follow our Code

Our Code applies equally to all pladis employees. We also require anyone acting for pladis to behave in a way that is consistent with this Code; this includes business partners, contractors, vendors, suppliers and all other third-party representatives. We will ensure that the Code will be provided not only to our own employees but also to those we contract with to ensure that their standards meet our own. Wherever we operate, pladis always abides by the law. By operating within the law and following pladis policies and processes, we ensure that we always do our best for our consumers, customers, communities and each other.

You should proactively promote and be an ambassador of ethical behaviour in the workplace and the community by always demonstrating honesty and integrity. The Code provides guidance on how you should deal with certain situations that may arise in the course of your work and who you should contact if you believe you or another employee may have breached these rules. If other situations arise that are not presently covered by the Code and you are not sure how to act, please contact the pladis ethics hotline.

Our Code guides us

Complying with this Code, laws and regulations

pladis' overall objective is to engage and compete effectively, responsibly and profitably in all its chosen markets. Our global presence means we need to operate within a complex framework of laws and regulations. We are committed to following all applicable laws, rules, and regulations. We need to be aware and comply with the different laws and customs that apply in each of the countries where we operate. We must simultaneously seek to respect the norms of our customers, business partners and co-workers provided they are not in conflict with the standards and principles of our Code. Failure to comply with this Code could lead to disciplinary action and in certain areas expose pladis itself to possible sanctions.

We all have a role to play in protecting our company's reputation. You will be required to provide an annual self-certification of compliance with the Code.

It is everyone's responsibility to:

- Work as a team
- Treat others with respect as you would wish to be treated yourself
- Be professional, honest, and ethical in all your business dealings on behalf of pladis
- Read and understand this Code
- Report any concerns about possible violations of laws, regulations or the Code to your line manager or via our pladis ethics hotline
- Co-operate with any investigations or audits.

Making good decisions

Always apply good judgement, help one another, and speak up whenever you have questions or concerns. If you see or hear something you believe is illegal or a violation of our Code - speak up! If you're still not sure whether to report a concern, ask these questions:

- Is it aligned with our purpose, Winning Traits & Behaviours?
- How does it comply with our Code our Conduct?
- Would I be comfortable with my decision if it was made public?

If your answer to any of these questions is "no", or "I don't know", then don't do it; contact your line manager or team leader or use any of the other resources listed in our Code of Conduct.

Waivers and exceptions

Given the importance of the Code, any future change to any provision of the Code must be approved in writing by the CEO and the Chairman and be in accordance with the requirements of applicable laws and regulations.

Caring for our people

Diversity, inclusion and dignity at Work

As a global business, operating across hundreds of consumer markets, and as custodians of renowned brands with hundreds of years of heritage, we have a responsibility to address inclusion and diversity head-on.

If we want to reflect our truly diverse customer base, then it's vital we have a diverse and representative work force, where everyone feels able to participate and achieve their potential.

Our shared commitment to an open and inclusive culture helps us to create a great place to work, one that attracts the right talent and capability for the business to achieve the best results. Everyone has a responsibility to treat others with openness, dignity and respect. We encourage accountability and want all our employees to feel a sense of achievement. Our continued success depends on our skilled and motivated workforce.

We are committed to equal employment opportunity and do not tolerate discrimination and harassment based on ethnicity, race, colour, religion, gender, gender identity, sexual orientation, marital status, age, national origin, disability, or any other characteristic protected by law.

At pladis, we value all the unique characteristics that make up each of us. Competing on a global scale, our aim is to build a diverse workforce as well as inclusive workplaces wherever we operate.

Free from bullying, harassment and intimidation

Bullying and harassment means any unwanted physical or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading humiliating environment. It is not necessarily always obvious or apparent to others and may happen in the workplace without an employer's awareness. Unlawful harassment may involve conduct of a sexual nature (sexual harassment). This can include unwanted physical contact (touching, grabbing), unwelcome sexual advances or suggestive behaviour, sending or displaying material that is pornographic, continued suggestions of social activity after it has been made clear the suggestion is unwelcome. We take a zero-tolerance approach to any kind of bullying and harassment. pladis requires the workplace to be free from all forms of employee bullying, harassment and victimisation related to age, disability, gender reassignment, marital or civil partnership, pregnancy or maternity, race, colour nationality or ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if does not fall within any of these categories.

All employees should be aware of the impact of their actions or behaviours on others both within and outside the workplace.

Caring for our people

These values extend to our employees' use of social media and email both within and outside of the workplace, and employees should comment respectfully about pladis, its employees, customers, suppliers and other parties associated with pladis.

Employees found to have engaged in behaviour incompatible with pladis policies may face serious consequences including disciplinary action, dismissal and legal action.

It is everyone's responsibility to:

- Treat others with respect
- Promote dignity at work and strive to create a workplace that is free from all forms of harassment and intimidation
- Keep an open mind to new ideas and listen to, and acknowledge, different points of view
- Help our suppliers and business partners understand our expectations and our belief in fair treatment and equal opportunity
- Understand that offensive messages, derogatory remarks and inappropriate jokes are inconsistent with our culture and beliefs and are never acceptable
- Understand that inappropriate comments of a sexual nature, or any other sexually offensive behaviour, will not be tolerated
- Remember that harassment does not have to occur in the workplace or involve an employee to violate our values or the law
- Refrain from spreading malicious rumours, including via email or social media, or use company assets to transmit communications that might be considered bullying, derogatory, racist, defamatory, harassing, pornographic or otherwise offensive.
- Refrain from making any political statement or comments. Increase your cultural awareness and be mindful that seemingly benign comments may be considered offensive by different individuals
- Making false allegations or accusations of bullying and harassment is not acceptable.

Environment, health and safety

We all need to play our part to make sure our work environment is safe for our employees, customers, consumers, suppliers and business partners. As a company, we conduct our business in compliance with all applicable workplace health, safety and labour laws. We have declared that all our workplaces are 'No Smoking' environments. pladis communicates to our suppliers the standards and procedures required and verifies adherence through a defined audit programme. pladis employees receive appropriate training in food hygiene, subjects and practices. pladis ensures that its manufacturing facilities are maintained to an appropriate standard as defined by the pladis Manufacturing and Hygiene Standard Operating Procedures.

Caring for our people

It is everyone's responsibility to:

- Be alert, and always look out for one another's safety
- To help ensure safety, never work while under the influence of drugs, alcohol or any substance
- Only undertake work that you are qualified and trained to perform
- Report any accident, injury, or illness. Never assume that someone else has made the report
- Know the emergency and security procedures that apply where you work.

Privacy and data protection

When working for pladis, you may be required to process personal data, including personal data about employees, consumers, customers and suppliers. Protecting this private information is a matter of trust that we take very seriously, and we will comply with our legal obligations and adhere to data protection principles when we process personal data.

Personal data must be used fairly, lawfully and only for the purpose it was obtained and data must be securely disposed of. We have a particular duty to our employees to respect the information we hold about them and to process it in accordance with their rights and freedoms.

pladis' Data Protection Controller can be contacted at privacy@pladisglobal.com for advice on data protection issues. pladis operates a 'no blame' policy for accidental or unintentional breach of privacy and data protection policies. No action will be taken against individuals causing or reporting accidental or unintentional data protection incidents so long as these are reported promptly.

It is everyone's responsibility to:

- Comply with our Privacy and Data Protection policies and standards
- Only collect, access or share personal data where there is a legitimate business reason to do so
- Protect the confidentiality of personal data about customers, consumers, current and former employees, as well as job applicants and business partners
- Learn about the types of information which are given heightened protection by law and company policy (such as Occupational Health records) and protect them through appropriate means
- Share personal information between pladis companies only where there is a lawful basis to do so
- Retain personal data for no longer than necessary
- Recognise information rights requests and ensure that they are passed to the Data Protection Controller without delay
- Report any loss or disclosure of consumer or employee information straight away to the pladis Data Protection Controller.

Complete assigned privacy and data protection training.

Conducting business with integrity

Competing fairly

We believe in free and open competition. We gain our competitive advantages through superior quality products rather than through unethical or illegal business practices. pladis insists on honesty, integrity and fairness in all aspects of its business and relationships and expects these values to be upheld by all of its employees and all those we do business with. pladis recognises that corruption can damage the economies in which we operate and perpetuate poverty and deprivation.

pladis supports free enterprise and seeks to compete ethically and fairly and within the framework of applicable competition laws. Competition laws exist in most countries where we trade. pladis requires all relevant employees to attend compliance training on an annual basis. We take breaches of competition law very seriously. Breaking the law may lead to severe criminal and civil penalties for the company and the individuals involved.

Competition or anti-trust laws are complex and compliance requirements can vary depending on the jurisdiction and the circumstances. The following activities are some of the examples which violate the anti-trust laws, they are not exhaustive and are contrary to our principles irrespective of whether permitted in any jurisdiction:

- Entering into any arrangement with competitors on sales prices, pricing strategies, product plans, marketing plans, and sales territories
- Agreeing on the price at which our resellers sell our products
- Agreeing not to compete
- Discussing competitive bids with other companies (bid rigging)
- Participating in market allocation (agreeing to allocate certain customers or customer groups, or certain territories)
- Selling goods or services at less than market values in order to hurt the competition (dumping)
- Making negative statements about our competitors on any platform.

It is everyone's responsibility to:

- First consult our anti-trust law experts before engaging in any sales or marketing activity that may have an impact upon our competitors
- Only collect competitive information that is lawfully available in the public domain
- Not use information that was obtained illegally or improperly by others, including by way of misrepresentation, invasion of property, privacy or coercion
- Ensure all agents, consultants and suppliers you work with are perfectly aware of this Code.
- Do not hesitate to use pladis ethics hotline if appropriate to do so.

Conducting business with integrity

Our responsibilities to shareholders

As a private company we recognise that collectively we manage the resources and assets of our company in line with the long-term interests of our shareholders. We take note of the opinions of our shareholders and commit to working positively with them in respect of our decision-making processes. We seek to uphold their standards in relation to our financial discipline, governance, and transparency.

Together with our Shareholders we will make decisions that will improve our competitive capability and invest to build a sustainable profitable business. Any public announcements will provide clear, timely, accurate information regarding financial status, strategies, investments, and risk profiles.

Marketing

Our product marketing reflects our high ethical standards.

We believe that advertising and marketing are valuable communication tools which can be used to help consumers make informed snacking choices. We also believe that all our snacks can, and should, be enjoyed as part of a healthy, balanced diet. As a business we are committed to responsible advertising and marketing communications, not only in the promotion of our brands but also in promoting and encouraging healthy and active lifestyles globally.

Our advertising does not feature animals which are inhumanely treated.

Supplier relations

Our suppliers make significant contributions to our success. We think of them as a partner towards our success and we always treat them in an ethical manner. Worldwide, we base our supplier relations on the fundamental concepts of honesty, fairness, mutual respect and non-discrimination. We source from high quality suppliers seeking to do business fairly and ethically and within the framework of applicable laws. All suppliers need to be aware and adhere to pladis Code of Conduct.

All purchasing decisions are made based on commercial criteria: cost, quality, service, timescales and reliability. We generally invite competition for the goods and services we buy.

It's important that we work together with our suppliers to make sure that they are compliant with all relevant laws and regulations. pladis operates an ethical sourcing policy and requires suppliers to comply with the Ethical Trading Initiative Base Code which specifies that child labour should not be used, there should be no harsh or inhumane treatment and requires that living wages are paid and working conditions are safe and hygienic.

Only those employees with delegated authority may commit pladis to contracts/expenditure.

Conducting business with integrity

All contractual relations should adhere to the legal GLAS contract management policy and the procurement contract management process.

When your position in the business enables you to make a personal benefit or gain outside your terms and conditions of employment, you have a conflict of interest.

You must not allow personal interests to conflict with those of the business and you should take steps to avoid actual or apparent conflicts of interest in your personal and professional relationships.

It is everyone's responsibility to:

- Protect the confidential and proprietary information of our business partners
- Make supplier-related decisions in the best interest of pladis, not for any personal benefit or gain for you or a family member or friends
- Do not hold or acquire any financial interest that is likely to adversely affect your ability to discharge your duties
- Do not allow your independent judgement to be influenced
- Be alert for any signs that our business partners are violating applicable laws, regulations or standards of human rights
- If you are involved in hiring new employees who worked for our competitors, make sure that they understand that we respect their obligations to honour the confidential information of their former employers.

Product safety and quality

Consumer health, safety and well-being are of utmost concern to us. Our relentless commitment to product safety and quality ensures that our consumers can purchase and enjoy our products with trust and confidence.

It is everyone's responsibility to:

- Speak up if you identify any working conditions that could have an impact on product safety or quality and listen and support others who speak up
- Ensure contractors and others we work with understand and follow our product safety and quality procedures.

Conducting business with integrity

International trade

Most countries in which we operate heavily regulate trade. We abide by the trade laws of all countries in which we operate including import and export laws, and regulations pertaining to economic sanctions. At times we may be restricted from buying and selling certain products in certain countries. This could be due to government advice, legislation or company policy.

It is everyone's responsibility to:

- Classify in advance products intended for import or export, and ensure that all required labelling, documentation, licenses and approvals completed
- Follow all applicable trade laws and liaise as necessary with indirect tax or export functions
- Ensure special care is taken when shipping and transferring products
- Ensure we do not knowingly break any trade restrictions which may damage our reputation and brands as breaking trade restrictions could lead to severe penalties for the company and the individuals involved.

Anti-corruption and anti-bribery

Bribery and corruption in all forms are completely contrary to the spirit of our pladis values. A bribe is any form of payment, benefit or gift offered, given or sought with the purpose of influencing a decision or outcome of someone in government or business. Corruption refers to the abuse of an entrusted power for private gain. Any unofficial payment to government officials or third parties sometimes referred to as 'facilitation payments' in order to obtain any permission, permit or stamp is not permitted.

It is everyone's responsibility to:

- Never give or lend money, goods or services to a government official
- Never pay a gratuity or facilitation payment or provide a gift to government officials or employees to expedite an administrative action
- Never make any payment or a commission to any third party excluding bona fide consultants for the purposes of being a 'fixer' to open doors and make connections for pladis
- Comply with the Gifts and Hospitality register in your region
- Make sure any third parties we use also understand they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions. It is especially important that we carefully monitor third parties acting on our behalf. We must know who they are and what they are doing.

Conducting business with integrity

Anti-money laundering and anti-terrorist financing

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of converting illegal proceeds so that funds are made to appear legitimate. Involvement in such activities undermines our integrity, damages our reputation and can expose the company and individuals to severe sanctions. We are committed to comply with all money laundering and anti-terrorism laws and will conduct business only with reputable customers involved in legitimate business activities. Any kind of aiding and abetting of a person committing such crimes is absolutely forbidden.

Keeping accurate records

pladis and its businesses have built up a strong reputation for integrity over many years and insists on high standards in all areas of our operations. We place a high importance on maintaining financial control and ensuring the integrity of financial information as reported both internally and externally.

Business partners, government officials and the public rely on our accurate, honest and complete disclosures and business records. Such information is also essential within pladis so that we can make good decisions.

To ensure that our books and records can meet these various purposes, they must be compliant with all local and national laws, accepted accounting principles, and our internal controls. Employees with a role in financial or operational recording or reporting have a special responsibility in this area, but all of us contribute to the process of recording business results and maintaining records.

It is everyone's responsibility to:

- Within your area of responsibility, ensure any accounting records are complete and accurate
- Obtain the necessary approval for expenditure prior to committing pladis, keep accurate records of your spending and comply with pladis policy relating to travel and entertainment expenses
- Cooperate with internal and external auditors, providing them with the information they require and ensure such information is complete, fair and understandable
- Contact your line manager, the employee helpline or the head of internal audit if you have reason to believe that inaccurate or false records are being kept by other employees or funds are being misappropriated
- Follow applicable laws and policies when creating, retaining, or destroying documents, including those in electronic formats
- Understand that you are accountable for the accuracy and truthfulness of the records you produce
- Keep your records organised in structured filing systems so they can be located and retrieved when needed.

Conducting business with integrity

Legal document retention

Documents should only be destroyed in accordance with our records retention schedules and policy, and never in response to, or in anticipation of, an investigation, disclosure, information rights request, audit, claim, lawsuit or arbitration proceeding.

Gifts and entertainment

This section on gifts, entertainment, hospitality and gratuities is designed to preserve and maintain pladis' reputation as a global enterprise, which acts with integrity and bases decisions only on legitimate business considerations. Employees must apply this code in good faith to ensure gifts and entertainment are never considered to be excessive, do not appear to confer any improper advantage, nor create an actual or perceived conflict of interest. These activities should never influence or appear to influence any business decision.

The giving and receiving of gifts or hospitality at a reasonable level can be an important part of building effective business relationships. However, the receipt of gifts and hospitality should never influence or appear to influence business decisions made on behalf of pladis. It is also unacceptable for pladis employees to attempt to exert or seek influence in exchange for inducements, regardless of local business practice. Before accepting or offering a gift or entertainment seek approval from your line manager. If the value exceeds £50 (or such other lower amount as may be applicable in your region) log the details in the pladis Hospitality Register.

Report anyone you think may have accepted but not disclosed a gift or improper payment to your line manager, call the employee helpline or do so via whistleblowing procedure if appropriate.

Our employees and their immediate families shall not accept or provide gifts or entertainment if the intent is to bias a decision or is given in return for any business, services or confidential information.

Insider trading

During business, you may become aware of material non-public information about publicly traded companies. Using this information for personal gain, sharing it with others, or spreading false rumours is illegal.

It is everyone's responsibility to:

- Never buy or sell any securities of any company based on material, non-public information
- Do not pass on material, non-public information or "tips" to others when trading, use care even if you 'think' you are not relying on material, non-public information

Conducting business with integrity

- Abide by our self-imposed 'Blackout Periods*' when dealing with Yildiz Group's shares
- Always check whether your name is on the insiders lists of Yildiz Group's publicly listed companies and abide by the reporting requirements.

*A period of time before the earnings release of a public company during which its directors and specific employees deemed insiders cannot trade the company's stock.

Protecting our company

Company assets

We all have a responsibility to use company assets and resources wisely and with care, and to guard against misuse, damage, loss, theft and waste.

Company assets include facilities, property and equipment, common working areas, tools, vehicles, supplies, computers and IT systems. Any information processed for company purposes is also a company asset, including working time, confidential and proprietary information, research and development material, marketing material, intellectual property, corporate opportunities and funds.

While it is generally not our practice to monitor employees' use of our information systems, pladis reserves the right to monitor the nature and content of an employee's activity using our company's email, phone, voicemail, internet, and other systems, as and to the extent permitted by local law.

It is everyone's responsibility to:

- Do your part to make sure our assets are not lost, damaged or misused. Protect our IT assets from misuse, theft and damage
- Act in accordance with generally accepted rules of behaviour in common working areas
- Use your working time efficiently and effectively
- Limit personal use of our phones and computer systems to a level that does not interfere with your work or that involves an outside business interest
- Ensure necessary approval before using noticeboards or putting any advertising materials in common areas
- Store company information only on company-provided computer systems and services
- Not leave information assets including IT assets in public or unsecured places
- Not misuse company resources for personal activities or install any non-approved software or connect any unauthorised device
- Not share usernames or passwords
- Not download, store, or pass on to others any inappropriate material.

Confidential information

One of our most valuable assets is information. The loss or misuse of confidential information can harm our reputation, cause us to lose a critical competitive advantage and damage our relationships with our customers or business partners. All information concerning our business is company property and should be adequately safeguarded. pladis takes all reasonable steps to maintain the security of data it holds.

Protecting our company

Confidential information includes but is not limited to: Employee information (names, addresses, home phone numbers, salary or wages, medical data and personnel documents), future / pending sales, acquisitions and mergers, pricing and marketing information, the company's strategic business plans and financial figures, data developed or purchased by the company or entrusted to us by our business partners, research and development materials.

It is everyone's responsibility to:

- Use and disclose confidential information only for legitimate business purposes
- Never disclose any publicly undisclosed information to third parties for either personal gain or for the benefit of anyone outside the Company
- Never share details of confidential projects
- Properly label confidential information to help others know how it should be handled
- Protect the confidential and proprietary information of business partners
- Never discuss confidential information when others might be able to overhear what is being said (for example on public transport, in elevators, and when using mobile phones in public spaces)
- Even when your employment at pladis ends, you are still prohibited from using confidential information or documents of the company for personal gain or for the benefit of third parties without express written permission.

Intellectual property

We always use our trademarks and other intellectual property properly. Our intellectual property is an invaluable asset and by protecting it we can maintain and grow our brand equity.

Intellectual property includes our trademarks, brands, recipes, databases, printed communication materials, processes, advertisements, package designs, logos, copyrights, inventions, patents, plans (marketing, production, technique), trade secrets 'know-how' and data insights (customer, consumer).

pladis will take all steps as are necessary to protect its intellectual property rights to ensure that they are fully respected. As well as protecting our intellectual property, we must respect the intellectual property rights of other parties. Our trademarks and other intellectual property must not be used by a third party without the approval of pladis Group Legal, and must not be used in a degrading, defamatory or otherwise offensive manner.

Our intellectual property also includes employees' work product. As an employee any work you create, in whole or in part, during your employment with pladis, belongs to pladis. You must immediately report any invention related to our business to the company, so that it may receive the same protection as our other intellectual property rights. Local regulations and contractual arrangements may apply. pladis Group Legal will be able to answer any queries you may have on the use of intellectual property rights.

Protecting our company

Conflicts of interest

A conflict of interest may occur when our personal interests make it difficult to perform our work objectively and effectively in support of the company's interests.

Each of us is expected to be proactive and, wherever possible, avoid situations that can lead to a potential conflict. If you find yourself in a potential conflict of interest, talk with your supervisor. Depending on the circumstances, some conflicts may be resolved if they are handled properly.

There are a wide variety of circumstances that could be considered conflicts of interest. While it is difficult to list them all, we have listed below common actions that can lead to conflicts, and which should be avoided.

It is everyone's responsibility to:

- Not be involved in activities that compete with, or appear to compete with, pladis
- Not let business decisions be influenced by personal or family interests or friendships
- Not use company property, information, or resources for personal benefit or the benefit of friends or relatives
- Not conduct activities directly or indirectly with any supplier of the company
- We should ensure that any contractor is not also providing services to any competitor or companies that have business relations with pladis
- Declare any potential conflict and ensure you are excused from any decision-making activity.

Relationships in the workplace

Relatives working together don't always make for one, big happy family. As many companies have discovered, family conflicts can sometimes spill over into the workplace, or favouritism may occur. As such, pladis does not support employees directly hiring family members. Should family members be employed by pladis, they must always work in different departments, and never in a direct reporting relationship. You must also disclose to your line manager, HR leader or Legal Department all business affiliations, activities or investments (including those involving immediate family members), to the extent they may adversely affect your independent and objective judgement, your ability to fulfil your performance duties for pladis or otherwise conflict with pladis interests.

Protecting our company

Outside business activities

Any outside activities you carry out must be disclosed and approved and not adversely affect upon pladis or give rise to a real or apparent conflict of interest with your duties to the company. You must be alert to potential conflicts of interest and be aware that you may be asked to discontinue any outside activity if a potential conflict arises.

Outside activities must not interfere with your job performance or require such long hours as to affect your physical or mental effectiveness. Your job at pladis should always be your first work priority. You must seek management approval for duties and significant responsibilities outside of work. (e.g. board membership, university posts, charitable trusteeships, local government roles).

Doing what's right

Corporate citizenship and community involvement

We are proud of our long-standing commitment to good citizenship and to be a good neighbour in every community where we conduct business. We believe we have a responsibility to society to use our resources — money, people and energy — wisely. We meet our commitment, through financial support, for a wide range of educational, health, social service, cultural, civic and environmental organisations.

While conducting all our activities and procedures, we treat all public institutions and organisations, non-governmental organisations (NGOs) and political parties equally, without any expectation of benefits. Being socially aware, we participate in various projects to contribute to the development of our society, our communities and our planet.

At pladis, we require that our corporate donations and social support are conducted for projects, organisations, and institutions which are aligned to our company values, ethical principles included in this Code of Conduct, and company reputation. You must seek management approval before choosing a charity to cooperate with.

It is everyone's responsibility to:

- Be sure that any volunteering you do to help local civic organisations participation does not interfere with your work
- Never solicit or pressure customers, business partners, or other employees to support your favourite charities or causes
- Talk with the Corporate Communications team before engaging with any NGOs or establishing new charity partnerships
- Ensure that any contributions towards, and support for, political parties are strictly personal and give no impression of being connected to pladis
- Ensure that any personal political support or contribution does not affect your performance or objectivity at work.

Human rights

One of the guiding principles of pladis is to respect others and succeed together. Our success can be achieved only when we treat everyone, both within and outside our company, with respect. We recognise the importance of maintaining and promoting fundamental human rights in all our business operations. We will not tolerate abuse of human rights in our operations throughout the pladis organisation and in particular we recognise the need for vigilance and expect everyone to 'speak out' if they become aware of anything which is contrary to our standards throughout our business and particularly within our extensive supply chain.

Doing what's right

We support the principles contained in the United Nation's Universal Declaration of Human Rights and the International Labour Organisation Fundamental Principles and Labour Standards. We operate under programs and policies that:

- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws
- Recognise employees' right to freedom of association
- Provide humane and safe working conditions
- Prohibit forced or child labour.

It is everyone's responsibility to:

Each of us can help support efforts to eliminate human rights abuses:

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners
- Remember that respect for human dignity begins with our daily interactions with one another as well as with our customers and anyone we do business with. We must promote inclusion and diversity in all we do internally and externally to protect the rights and dignity of everyone with whom we deal.

Sustainability

We are an environment-friendly company that not only operates in full accordance with environmental legislation, but we also work towards decreasing air, water and soil pollution, and to increasing recycling whenever possible. Every member of the pladis family - our employees, suppliers, customers, board of directors, and all our business partners - is encouraged to take responsibility for improving our environmental impact and meeting our goals.

Being open and transparent with the public

Everything we do and everything we say can affect pladis' reputation. In an interconnected world, where information travels instantaneously, we must carefully manage our communications with all our external stakeholders from media and government through to customers and NGO's.

Our corporate messages at pladis are managed through our Corporate Affairs and Communications team who work to ensure that our messages, information and commentaries are clear, accurate and do not mislead the public. We treat media organisations equally and nurture equal relationships.

Doing what's right

You should forward any request from the media regarding financial or sector information with the Corporate Affairs and Communications team. No individual, except specifically appointed spokespersons, can provide information to the media.

Corporate Affairs and Communications team should approve all external speaking opportunities before they are agreed to. This will ensure that:

- Commentary is accurate as well as responsible, transparent, and authentic
- As a company, we don't associate ourselves with any kind of religious, political and social groups or organisations
- We do not indulge in derogatory statements about our competitors
- We respect copyrights, trademarks, rights of publicity and other third-party rights in any communication material
- We do not disclose personal data in our communications without a lawful basis to do so

It is the Corporate Affairs and Communication Team's responsibility to:

- Deal with questions and requests from the media
- Oversee and approve any Corporate social media accounts
- Act as a spokesperson for pladis where necessary.

Using social media

We must all take care when writing communications that are published online. If you participate in social media and have personal channels that you post on, you should make it clear that the opinion you are expressing is your own not pladis'. You should also recognise that you may have no control over your comments being copied or passed on and if they bring the company into disrepute or conflict with our policies and codes it may result in disciplinary action. You must take particular care about both your personal and professional postings if your social media account identifies you as a pladis employee.

It is everyone's responsibility to:

- Never publicly comment on confidential and non-public company information such as the company's current or future business performance or business plans
- Be fair and courteous, and never post content that may be viewed as malicious, obscene, harassing, defamatory or discriminatory
- Always provide a source or reference when you post someone else's content/asset
- Operate from the basis of "don't write/say anything that would make you feel uncomfortable". If it makes you feel uncomfortable, there's a good chance that others will feel the same way

Doing what's right

- Think about the consequences. There's a big difference between speaking "on behalf of" the company and speaking "about" the company
- Make sure to disclose your affiliation to pladis, when you do talk about the company
- Make it clear that what you say represents your personal views and opinions and not necessarily those of pladis, whenever you publish content to any form of digital media. The form of disclosure might differ from one platform to another, however, make sure it is clear and part of the message itself
- Not share any political ideology while using your corporate title or on any social media account that identifies you as a pladis employee
- Not respond if you read an online comment about pladis that you believe is erroneous; instead, contact the Corporate Affairs and Communications team so that appropriate steps can be taken.

Helpful resources and raising concerns

Every pladis employee is responsible for acting ethically and following our Code. The Code sets out how we should all behave on behalf of the business.

If you suspect the Code or local laws are not being followed, you are required to report it. So if you see or hear something you believe is illegal or a violation of our Code then please know that you can always speak up.

To help employees we have set out below the ways by which all employees can access the means to raise concerns within their region.

When you speak up to ask a question or report questionable conduct, you are protecting your employees and the reputation of pladis. Remember, an issue cannot be addressed unless it is brought to someone's attention. Any employee who acts in good faith to raise a concern about a possible breach of the Code will be supported by the business. It is against pladis Policy and the law to dismiss, harass or otherwise discriminate against employees who raise concerns in good faith, even if you are mistaken.

What will happen

All allegations that a law or the Code have been breached will be thoroughly investigated by pladis.

Doing what's right

Where to go for help

You can ask questions and report possible violations of our Code by using any of the following methods:

- In most instances the best first step is for you to talk to your line manager unless you suspect they have breached the Code. They will be familiar with the laws, regulations and rules that relate to your work
- If you are not comfortable talking with your line manager, talk to your Human Resources Business Partner or Legal department.

If none of the above steps resolves your concern, you can, at any time, contact the pladis ethics hotline online or by telephone (the details are provided below). All reported concerns are confidential, and you may remain anonymous where allowed by local law. If you do provide your name we will be able to contact you if further information is required and also report back to you the results of any investigations.

Ethics hotline

You can report a concern confidentially using our dedicated hotline service at

<https://pladisethicshotline.ethicspoint.com>

Concerns can be reported using the online form or via the country telephone number for where you are located. Telephone numbers can be found on the website when reporting a concern, or in pladis Policies and Procedures on SharePoint.

Our non-retaliation policy

We will not tolerate retaliation against anyone who makes a good faith report of an alleged violation of the law, or our Code of Conduct.

We take claims of retaliation seriously. If you believe you have been retaliated against, you should contact your lead HR Business Partner, Company Legal Counsel, or any of the resources listed in this Code.

pladis employees must always do the right thing and act with honesty and in good faith.

Policy review

Policy review

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