

# CODE OF THE CORPORATE ETHICS

**EKOPLAST LLC** 

#### APPEAL OF THE SENIOR MANAGEMENT OF EKOPLAST LLC

The Code of the Corporate Ethics of Ekoplast company is a declaration of obligations of Ekoplast to society, business partners, clients and, above all, to its employees.

The Code is an official document that is obliged to follow by all the employees of the company, regardless of experience, position, personal habits, or preferences, and which regulates the need to build the right relationships with the team and society, to adhere to ethical standards in the day-to-day operations of the company.

By implementing and promoting the Code of the Corporate Ethics, we aim to improve:

- understanding of Ekoplast's mission goals and strategies by its partners and personnel;
- formation of the desired corporate culture;
- definition of the common values, shared by the management and employees of Ekoplast;
- \* effectiveness of adaptation of new employees and acceptance of the company's common values by them.

Honesty and decency are the basis of the activities of Ekoplast company. The trust of our clients and business partners is the key to success, both for the company as a whole and for each of its employees separately.

Each employee should be aware of the personal responsibility to clients, business partners and colleagues for the quality and conscientious performance of their work duties, which is also a guarantee of achieving our common success.

As one of the industry leaders, we must adhere to the highest standards of professional ethics - to conduct business honestly, transparently, and professionally, which is extremely important for strengthening the business reputation of the company and maintaining its competitive advantages.

We greatly appreciate the reputation of Ekoplast company, the reputation of our clients and partners. Ethical business conduct serves as a moral compass in our daily work and is the basis of all our actions, business decisions and is a way to achieve our goals.

We encourage an open corporate culture where each employee can share their ideas, exchange information, seek advice and discuss the issues.

As senior management of Ekoplast, we are committed to run the company in full compliance with the moral, ethical and legal standards, set out in the Code of the Corporate Ethics, and require their implementation on the side of all the employees.

#### CO-FOUNDERS OF EKOPLAST LLC

Leonid Bokhonko	Viktor Tymtsias

#### ABOUT EKOPLAST LLC

#### **Company Chronicle**



EKOPLAST company was founded on April 28, 2001.

The company started its activity with the production of plastic garbage bags and within a few years significantly expanded the range of the household products.

Since 2008, the main activity of the company is the production of cooking bags. In the same year, the company became a member of PLMA (Private Label Manufacturers Association) and received its first outstanding award – "Industry Leader 2008".

In a few years the company developed and implemented the production of plastic clips from heat-resistant polymer films for tightening the oven bags. In 2010, Ekoplast received "Company of the Year 2010" award, being selected from 35000 industry enterprises in Ukraine.

In 2013, Ekoplast was recognized as one of the best exporters and got "Exporter of the Year" award. In the same year, the company was awarded a statuette and diploma of the laureate of the All-Ukrainian program "Golden Hands of the Country".

For 20 years of successful activity, the company has gained and strengthened the reputation of a reliable manufacturer and supplier that always promptly solves special requests of its partners and customers.

For all the time of its activity, the company has received about fifty awards and letters of commendation, which testify the correct approach to doing business and determining the main values of the company, namely:

- modern technologies and equipment;
- innovations and self-development;
- highly qualified personnel;
- constant quality control;
- flexible and individual approach to each partner.

The key advantages of the company also include a well-established service of the European level. The company cooperates only with proven and reliable suppliers of raw materials and only on official terms. Our partners are the companies, operating in the markets of Europe, Latin America, and southwest Asia.

The company has implemented an integrated quality management system, which is certified in accordance with the requirements of the Quality Management System ISO 9001:2015 and the Food Safety System FSSC 22000.

Today, EKOPLAST is one of the leaders in the production of folded cooking bags in the world.

#### Company policies and goals

The company's policy is to be open and flexible, fully comply and even exceed the expectations of our consumers and business partners, while doing business honestly, transparently, and professionally.

Our mission is 100% customer satisfaction from convenient and fast cooking, using quality products of our company.

Our goal is continuous development:

- expansion of sales markets and assortment of our products;
- long-term and mutually beneficial cooperation with our partners;
- consumer trust;
- constant profitability and leading position of EKOPLAST in the markets, where our products are presented

#### Company philosophy

Achieving strategic and short-term goals in the most effective way. At the same time, our attitude to others is fair and honest to ourselves!

#### Company value

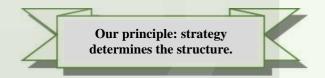
The undeniable value of the company is its personnel.

Our employees are our main competitive advantage and our heritage

Systematic training and development of the personnel to maintain and improve its professional level is one of our main tasks to maintain the company's leading position in the world market. The structure of the company is our internal structure, which characterizes the composition of the departments and the system of interconnected relationships to ensure the achievement of strategic goals of the company.

Ekoplast is operated by a team of professional managers under the supervision of a director.

Organizational structure of EKOPLAST is built on the principle of subordination by hierarchy (vertical). The company's employees are grouped into departments and subordinate to their department head, which allows to clearly understand their place in the organization for teamwork to achieve the company's goals.



Therefore, we evaluate the effectiveness of the organizational structure in its capabilities in achieving the strategic goals of Ekoplast.

If it is necessary and in the interests of business, the structure of the company can be changed. In this case HR department develops optimal proposals that are submitted for the approval of the director.



#### Company structure

During the years of the company's activity, its structure has undoubtedly changed and improved, based on strategic goals and market requirements.

#### BUSINESS ETHICS OF EKOPLAST LLC

## Principles of Company's Business Ethics



It is the basis of our brand and reputation. The best long-term relationships are based on trust, so our clients, business partners, staff and the society, in which we carry out our work, count on loyalty to common interests and compliance with our business ethics.

### HONESTY:

in all our actions and deeds, we must be as honest as possible with ourselves, our customers and colleagues. No circumstance justifies untruth and deception.

### JUSTICE:

to be fair means to adhere to legal and moral norms, to perform one's duties conscientiously and to follow the generally accepted order, to act impartially and respect others, to always have one's own point of view, but to listen to common opinion.

#### RESPONSIBILITY

our every action or inaction has its consequences. We understand the consequences of our decisions and do not blame others for our actions.

## Business ethics regarding services and financial documentation

All services of EKOPLAST should be carried out professionally and honestly, in accordance with the adopted standards, procedures, regulations and policies of the company in the field of quality, food safety of products, labor and environment protection, as well as the current legislation of Ukraine and the countries of our business partners.

All validation results must be properly documented. Reports, certificates, protocols, and other documents should not contain misleading information. Conclusions and comments must be confirmed by a reliable and accurate report on the work performed, compiled with the requirements of documentation at Ekoplast.

The information recorded in the reports of Ekoplast must be reliable and objective, upto-date and accurate. All financial transactions must be correctly and accurately conducted and recorded, and the data must be confirmed by the relevant documentation.

All records must be kept in accordance with the requirements of the current legislation and standards of Ekoplast.



## Ethics regarding the goods

EKOPLAST company produces and sells products, quality and food safety of which fully meet the requirements of the existing integrated quality and food safety management system of our company and terms of contracts with the business partners.

Product quality, food safety, its compliance with contract terms and legal requirements are the priorities of our business.

All employees of EKOPLAST LLC, involved in the production of products, must adhere to the following principles:

- when producing the goods think about the final consumers, their safety and satisfaction when using our goods;
- in production processes strictly adhere to the requirements of the current system of quality and food safety management, methods, working instructions and procedures, including Ekoplast policies in the field of quality, food safety of products, labor and environment protection;
- \* always follow personal occupational hygiene and workplace hygiene. An indicator of the high culture of work in our company is to maintain cleanliness and order in the workplace according to the "5S" system;

#### Your workplace is a mirror of your personality

- show solidarity, mutual assistance and mentoring to new employees, train them in order to gain skills of independent work and awareness of the specifics of the profession for the production of quality and safe goods;
- always adhere to the principles of lean production. Treat company property as your own. Remember that reasonably saved resources, including time - improve the financial well-being of our company, and hence our personal well-being, through timely and full payment of wages;
- be interested in the production process, do not limit your area of responsibility only to your workplace. In case of detection of violations by other employees of the instructions or standards of the existing Integrated Quality and Food Safety Management System or the Code of Corporate Ethics - report these violations;
- remember that even outside the premises of Ekoplast - the employee is the bearer of the image and reputation of the company;
- be guided by the principle: "It is always better to do good immediately than to redo later", because it leads to loss of time, loss of productivity and loss of material values.

#### Customer Relationships

Maximum satisfaction of customer needs is one of the most important activities of our company We strive for the highest standards of service, so we consider the peculiarities of each client's interests when providing them with the best service.

We are interested in establishing longterm partnerships with customers and contribute to the development of these relationships as much as possible, creating all the necessary conditions.

Polite attitude to the client, restraint, tact, business style of communication and behavior are the basis of business relationships with our clients

In relations with the clients and business partners, we adhere to the following principles:

- creating equal conditions for all our clients, because we do not divide them into important and insignificant;
- applying an individual approach to the needs and requirements of each client, since each of them has considerable value for us;
- providing customers with products and services of only the highest quality in accordance with their requirements;
- honesty in all aspects of our business: full fulfillment of our obligations and expectations of fulfillment of obligations from our partners;
- mandatory after-sales service and careful consideration of customer requests;
- constructive and timely satisfaction of possible client's claims;
- we preserve our reputation, strictly adhere to the norms of business ethics and rights;
- we expect that our business partners also maintain high standards of ethics;
- we always find a mutually beneficial solution, consider the cultural characteristics of countries and regions when making decisions and carrying out our activities.

Both customers and any visitor of our company should be treated respectfully and welcomingly. As a rule, company visitors are greeted by the secretary and accompanied to the necessary specialists, or the specialists are informed about the visitor arrival. There should be no situations when the visitor is in the office alone, unaccompanied by the secretary and waits for a long time to meet with an employee of the company.

An employee of our company must react immediately to the appearance of a client.

#### Customer service over the phone.

The customers gain an impression of the company Ekoplast, in particular during the first telephone conversation, so the company's employees, who communicate with customers, are required to have business communication skills.

Ignoring phone calls is not allowed: the call must be answered no later than after the third ring. When answering a phone call, you should be the first to greet, introduce yourself and announce the name of the company. Incoming phone calls at Ekoplast are received by the secretary and forwarded to the necessary employees.

In the case when the employee is not able to pick up the phone, one of the colleagues should answer the phone call. The phone call should not be ignored.

The language of service in the company is the state language
- Ukrainian. At the request of the client, the service may also be provided in another language, acceptable to the parties

#### Relationships with competitors Relationships with personnel

In our relations with competitors, we agree that healthy economic competition contributes to the well-being of the population and the state. We respect the intellectual and physical rights of competitors to property, avoid illegal methods of influence.



Our company pursues its business policy based on competitive and fair market practices. The company never enters into relationships with competitors, including signing agreements, if such relationships or arrangements may negatively affect the markets in which companies operate. We avoid unfair deals with competitors on pricing policy issues.

Our company does not provide knowingly false or unreliable information about its services or opportunities, as well as knowingly disrespectful and unreliable information about its competitors.

Our company does not collect confidential information about its competitors using illegal or contrary to business ethics means.

The personnel policy of our company is aimed at creating a cohesive and highly professional team of like-minded people who can respond objectively and responsibly to changing market requirements.

EKOPLAST builds its relations with the personnel on the principles of long-term cooperation, mutual respect, and strict fulfillment of mutual obligations.

Interaction of the Company's Senior Management with personnel is regulated by the Collective Agreement and the Internal Labor Regulations, which define the rights and obligations of the employer and employees, as well as standards Integrated Human Resources Management System, which indicates the priority directions of HR strategy implementation.

Business relations in the company are built in such a way that allows to:

- establish relationships with the staff, based on trust, decency and honesty;
- ensure correct treatment and respect for basic human values and aspirations;
- ensure the privacy of the employees;
- ensure the protection of personal data of the employees;
- form an employee's sense of belonging to the company;
- stimulate the continuous development of employees at all levels through trainings;
- ensure a competitive level of wages;
- ❖ to create safe, healthy and comfortable working conditions for each employee;

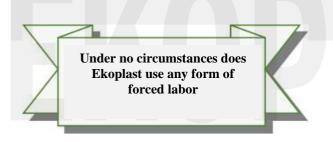
- treat each employee with respect, do not limit their self-esteem, prevent abuse in the workplace, in particular sexual harassment, physical or psychological abuse or humiliation of employees in any form;
- prevent the use of forced labor and involuntary labor of prisoners.

Our company supports the principles of universal respect for human rights and principles in the field of labor, which are key fundamental principles in the system of norms of international law, and, in accordance with the Constitution of Ukraine, are a component of the legal system of Ukraine.

We support and respect:

- protection of human rights, recognized by international documents;
- equality in labor and employment, prohibition of discrimination at work;
- freedom of association and the current recognition of the rights to conclude a collective agreement;
- freedom of work and employment, prohibition of forced labor;
- **ban on the use of child labor.**

According to the company's rules, we do not hire minors under the age of 18. Our company opposes any form of child exploitation, slave labor, fails to sell or trade children.

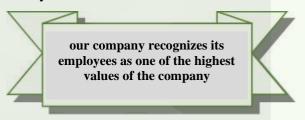


In its relations with the personnel Ekoplast uses the principles of equal opportunities regardless of race, skin color, gender, religion, political beliefs, social origin, age, or health status (disability). Discrimination is not allowed according to the above criteria. The company's employees are evaluated only in accordance with their work skills, qualifications, treatment and level of performance of their duties.

However, our company does not use the services of suppliers or subcontractors who use forced or child labor. To do this, we use moderate inspection and monitoring practices to ensure that potential suppliers or subcontractors properly comply with these requirements of our company.

#### Respect for employees

We are sure that the success and stability of our company mainly depend on the professionalism of those who work in it. That is why



We respect each other and expect that all employees of EKOPLAST will be guided by a sense of personal responsibility. We have competent, motivated people who respect our values and to whom the company provides equal opportunities for development and career growth.

Our efforts are aimed at maintaining a safe and healthy work environment, so it is very important for us to comply with all laws and regulations of the labor legislation. One of our principles is equal hiring opportunities for all categories of employees, which means that EKOPLAST is not and cannot be a place of discrimination or any pressure. It is not allowed to require a pregnancy test or other forms of medical examination (HIV/AIDS) during employment that may lead to discrimination.

Our duty is to create a comfortable work environment in which employees will feel respectful of themselves, regardless of individual differences, talents, and personal qualities.

Our task is to ensure that the work of each employee is evaluated objectively, based on personal contribution to the achievement of a joint result.

We welcome differences between employees and try to make benefits of individual differences and everyone's contribution. At the same time, we treat each other with respect, maintaining an atmosphere of trust and openness.

We recognize the need of each employee to achieve a balance between the personal and professional aspects of their lives. We respect the rights of employees to privacy, so we request to provide only the personal information that is necessary for the business processes of our company or required by applicable law.

Heads of the departments of our company are personally responsible for ensuring effective interaction of departments. To be a benchmark of behavior for employees of their division, they must demonstrate respectful, friendly attitude to all employees of the company and external partners.

In EKOPLAST it is not allowed:

- aggression, intimidation, verbal abuse, including sexual insults or insults to the opposite sex;
- pressure on management's decisions regarding work or attempted blackmail, invitation to work of close relatives and their unreasonable career promotion;
- use of the company's resources for personal purposes;
- statements and actions that may cause damage to the company;
- the use of alcoholic beverages in the workplace or at the territory of the company.

EKOPLAST company supports the desire of employees to prevent unlawful or unethical behavior. If an employee encounters this behavior, they should inform their immediate manager or report them to the HR department.

#### Relations among employees

Business relations among employees and their subordination in the workplace are determined by the organizational structure of EKOPLAST company. The relationship among departments and their employees in the company is governed by the Regulations on Departments.

Principles of general ethical rules among employees:

- greet everyone;
- do not touch on personal topics during working hours and do not discuss management and colleagues unless it concerns the workflow;
- in relations with colleagues of the same level, adhere to corporate ethics: partnership, goodwill, understanding of their personal tasks and full responsibility for them;

- adhere to a transparent workflow with clearly distributed tasks (to reduce the number of inefficient employees in this process);
- \* speak carefully about the results of the work of a colleague because harsh criticism, affecting the personal qualities of the person, will not help to improve the work process and relationships.

Our open-door approach allows employees at all levels to openly communicate with each other and freely join the workflows. The participation of personnel in the work of the company at all levels begins with an open exchange of views, both on certain aspects of the business, and on the activities of the company as a whole.

Our company strongly welcomes and encourages constructive proposals of employees to change or improve the existing business practices.

Teamwork and the efforts of all employees are the conditions for success. EKOPLAST welcomes friendly relations of employees and contributes to the preservation of a favorable socio-psychological climate in the team. All contradictions between employees are primarily resolved by their direct managers, which means that the direct managers are obliged to listen to their subordinate employee and respond appropriately.

If the direct manager cannot or does not want to listen to his subordinate, or is a participant in the dispute, the employee has the right to contact the HR department — the representative of the senior management on social responsibility. The highest instance for employee requests is the Senior Management of the Company.

It is important for us to maintain the spirit of cooperation within the company.

Our principal position: we treat all colleagues in the company, as well as our customers and business partners, with respect and kindness. Each of us strives to perform our duties as fully and responsibly as possible, contributing to the achievement of the company's strategic goals.

#### Information exchange

In our company, at any stage of the workflow, all employees certainly communicate with each other, share important information and receive instructions from their managers, that is, they carry out constant communication - information exchange process.

The process of organizational communication in the company is set up in such a way that information is disseminated to working groups and departments by informing the heads of departments or processes through meetings or conferences with subsequent delivery of working information to all company staff.

In our company, the means of communication are:

- oral communication;
- telephony: office automated telephone station, which allows to use internal wired telephone communication;
- radio telephone communication: cellular communication via mobile corporate phones;
- Email-messages via corporate mailboxes;
- Video conferences:
- information and communication resource of the company - BuZuKa;
- stax.

The most acceptable in our company is the exchange of information through horizontal communication between different departments and key specialists, which allows to determine a clear division of responsibilities, powers and responsibilities of departments, use of modern means of communication and ethics, resulting in coordination and cooperation of. employees to achieve the strategic goals of our company.

The official means of exchanging information in the company, both between employees of the company and the external environment, is electronic correspondence through corporate electronic mailboxes

For employees of the company who use corporate e-mail, mail clients must be configured in such a way that:

- the email contains the signature that mentions: employee's name and surname, their position, name and logo of the company, contact phone numbers, if necessary: Skype of Ekoplast, official postal address of the company, address of the corporate website;
- ❖ in response to received mails, automatically created "confirmation of receipt" and / or "confirmation of reading" are sent with indication of the date, subject and duplication of the first three lines of the text of the original letter;

- ❖ for the period of temporary absence of an employee (vacation, business trip, temporary disability) for more than one working day − the automatic notification should be set up to inform the senders of emails about the absence and the period of absence of an employee and to whom it is possible to reach out during this period;
- ❖ a response to the e-mail must be provided within 24 hours after email receipt by the employee who is the main recipient of the letter. If the letter is sent to several employees at the same time, the priority of recipients should be understood in the order of entering e-mail addresses from the first to the last. If it is impossible to provide a comprehensive response within 24 hours the author of the letter must be notified of the period during which such response will be provided. Emails should not go unanswered;
- An employee who has sent an e-mail but has not received a reply within 24 hours re-sends the e-mail with a copy to the CEO and notifies the recipient of the e-mail by phone within a working day. This clause is mandatory and, in case of evasion, the employee who did not send the letter again is responsible for the information not received;
- when resolving any work issues, the approval of the director or instructions to work sent by an email are considered official;

❖ Acquaintance of employees with the working documentation of the company by e-mail is considered official if the employee has sent information about the acquaintance.

#### **Conflict of interests**

Conflict of interests arise when the personal goals and personal interests of a company employee may prevent him or her from performing his or her duties objectively, independently, and impartially, or from making important management decisions. The same applies to family members and relatives of employees of our company, if their activities or personal interests' conflict with the interests of the company.

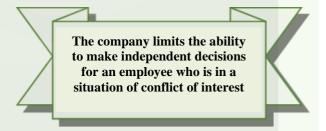
Employees are obliged to avoid such situations and not to create conflicts of interests, which include:

- use of EKOPLAST, its reputation, access to official information for personal enrichment or enrichment of other persons;
- obtaining personal benefit or benefit of family members, relatives or other persons by abusing official position in Ekoplast company;
- offer to provide personal professional and consulting services to the client or potential client of Ekoplast, including outside the company;
- creating competition for EKOPLAST by establishing own similar business or working for competitors;

- engagement of the companies, where the employee Ekoplast or his family member or a close person directly or indirectly has financial interests, as Ekoplast's suppliers or subcontractors is not allowed, except when:
  - \* employee openly and honestly informed the manager about the potential conflict of interests;
  - \* an employee who is in a conflict of interest does not participate in the procurement process.

Conflicts of interests can occur for many reasons. In case of doubts about a possible conflict of interests, the employee should contact the management for clarifications and recommendations.

Employees of Ekoplast must notify their immediate manager if they believe that their personal interests or the personal interests of a family member or close person potentially may be contrary to the interests of Ekoplast company.



If due to objective reasons it is impossible to resolve the conflict of interests, the interests of clients have the highest priority. In case of the conflict of interests between the employee and the company, the interests of the company have higher priority.

Hiring a family member or close person of the company's employee contradicts the company's rules in order to avoid a possible conflict of interests.

In special cases, to hire such persons, an employee of the company needs the prior consent of the company director and the head of the HR department.

The full list of family members and relatives is determined by the current Law of Ukraine "On Prevention of Corruption"

All existing or potential conflicts of interests in the professional or personal relations of employees are subject to impartial and detailed consideration. Various situations arising regarding the disputes, conflicts of interest are considered by the company's top management with the participation of the head of the company's personnel management department.

We recognize the legal right of employees to be engaged in other employment activities outside of Ekoplast

If you have such an activity or intend to engage in it, a company employee is obliged to:

- inform your immediate manager and HR department about the presence of another labor activity;
  - be sure that this activity will not cause damage to Ekoplast;
  - \* adhere to the rules for the preservation of confidential information and trade secrets, established by this Code and other company documents;
  - prevent the negative impact of this activity on the performance of the direct duties in Ekoplast;
  - carry out other labor or commercial activities only during your non-working hours in accordance with the provisions of the company and the current labor legislation.

Ekoplast company does not approve the employment of an employee for additional work in another organization, if this organization:

- ❖ is a client of Ekoplast company, for which the employee performs services as his official duties in Ekoplast;
- ❖ is a competitor of Ekoplast;
- is engaged in the supply of goods, raw materials or services for Ekoplast.

Failure to provide information to the director of the company or the head of the HR department about such employment is a violation of the Code of Corporate Ethics of Ekoplast and entails certain consequences, specified in the section "Responsibility for compliance with the Code".

#### **External Links**

Our company uses Internet resources for free access of all interested parties to the information, disclosed by Ekoplast.

The WEB-site of our company publicly presents information about Ekoplast, products manufactured by the company, stages of development of the company, reports on corporate social responsibility, the Code of Corporate Ethics, valid quality certificates and Contacts.

When participating in interactive discussion forums, social media, employees of Ekoplast must act in accordance with the requirements of the Code of Corporate Ethics.

Employees of the company who do not have the appropriate authority are not entitled to speak on behalf of the entire company, introduce themselves as representatives of the company in case of accidental interviews or video footage of journalistic reports, discuss or disclose any company-related information to the media, and make any statements to the public on behalf of the company.

Ekoplast letterheads, emails and other official documentation should not contain personal opinions of employees for religion or politics, as well as any information that may cause contradictions if such opinions and such information may be attributed to Ekoplast.

## Interaction with state authorities

Ekoplast company is in constant interaction with state authorities that control different aspects of our company's activities.

We undertake to do business with state authorities without personal interest, without resorting to illegal ways of influencing administrative decisions. It is prohibited to give monetary rewards or gifts, directly or indirectly, by the company's employees to any government official in order to encourage him to act in a way that influences the actions or decisions of government agencies

Written or oral information requests concerning Ekoplast may be sent to the company's employees by state regulatory bodies or civil servants. In case of such requests for information or documentation, employees should contact the company's legal department for advice.

Our company strictly adheres to the requirements of the legislation of Ukraine and the countries in which it operates. Different aspects of Ekoplast's activities can be regulated by different laws.

In case of any doubts about understanding the legislation, consultation with the legal service of Ekoplast is necessary, because ignorance of the law does not exempt from liability.

In cases where this Code or the policies of Ekoplast provide for more demanding standards than the requirements of applicable law, employees follow the company's standards. In case of any difficulties in resolving conflicts between this Code and applicable law, employees seek appropriate instructions from the company's legal department.

In relations with government officials, we adhere to the principles of building relations on the terms of cooperation, openness, transparency, and equality.

## Policies against bribery, corruption, and money laundering

Ekoplast has implemented and operates the Regulation on Prevention and Counteraction to Corruption, which obliges all employees of the company to strictly comply with the requirements of this Regulation and be sure that Ekoplast conducts honest business and ensures compliance with the principles, highlighted in the Regulation on prevention and counteraction to corruption.

Our company insists on honesty, decency, and fairness in all aspects of its activities and expects the same from its business partners and suppliers of materials, goods or services.

Our company does not pay or offer any illegal incentives (bribes) for the effective conduct of its business.

Every employee of our company, facing a bribe demand, is obliged to immediately notify their direct manager or the legal service of the company.

We do not hire third parties to provide services for bribes, illegal commissions, or kickbacks on our behalf.

Our company does not use the services of intermediaries, agents, consultants, partners and contractors in cases where they may be involved in corruption or other illegal activities.

Intermediaries and sales agents are not involved in cooperation with our company, unless a preliminary legal audit of the assessment of their activities is carried out, and the desired remuneration of the intermediary does not correspond to the services provided.

Ekoplast company does not sign contracts with suppliers based on personal preferences of employees, who may have commissions from them. Employees of the company are prohibited from requiring a contractor or a person, seeking to offer services to Ekoplast, to provide any personal benefits.

The employee of our company cannot be charged due to refusal to give a bribe, due to refusal to participate in corruption actions or refusal to pay remuneration for simplification of formalities.

One of the main aspirations of Ekoplast is to do business with business partners, who have a high business reputation and carry out legal activities and whose funds come from legal sources.

Legalization of illicit proceeds is a crime that shows signs of concealing a source of income in combination with criminal activity, such as terrorism, drug trafficking or bribery.

This crime is committed when money, obtained by criminal means, is put into commercial circulation in such a way as to give an impression of their legality or that it is impossible to determine its owner and source of origin.

To prevent the use of Ekoplast as a tool for money laundering, our employees comply with all accounting requirements, maintaining documentation and financial reporting relating to cash payments and other payments in regards our commercial or other business transactions.

The legal service and the accounting department of the company carefully monitor the unusual features of payments and suspicious behavior of counterparties and other persons. If there are suspicions or questions about the proposed transaction, the responsible employee of the company is obliged to contact his direct manager and the legal service of the company.

#### Gifts, hospitality, or representative events

Gifts, hospitality or representative events for civil servants, clients or auditors are strictly regulated and mostly prohibited. Such gifts and events may take place only if you obtain permission from the Company's Senior Management.

Gifts, entertainment events for customers or suppliers or, conversely, on their behalf, should not under any circumstances affect decision-making and even create visibility of such an impact, as well as go beyond the usual business relations. For each business gift or entertainment event, there must be a justified business purpose, which does not contradict the legislation, the policy of the donor and the recipient, the policies of Ekoplast company.

The cost and frequency of business lunches and entertainment events with the participation of customers and suppliers should be reasonable and not contrary to the principles, established by Ekoplast company.

Gifts, entertainment, and activities are not allowed or accepted if they affect or create an opportunity to unduly influence business decisions or may damage the business reputation of our company.

The rules of doing our business are based only on objective criteria of legality, so we never give or offer, in a direct or indirect way, anything costly to third parties, in particular to civil servants, political parties or candidates to influence the official decisions of these persons or gain an advantage illegally.

At the same time, Ekoplast employees should never accept from suppliers and customers or persons who have or may have a business relationship with the company any cash, "tips", loans or gifts in cash.

involved Employees, in selecting suppliers, should not accept personal gifts, offered by suppliers or potential suppliers as an incentive to cooperate. Participation in and information entertainment events. including trade fairs or similar events. sponsored by suppliers, is allowed, if approved by the company's top management, based on the employees' motives for participation in these events.

## Political and social activities

Our company recognizes the importance of working for the benefit of society and encourages the participation of its employees in social activities. While participating in public life, we must protect the interests of the company and strictly adhere to the rules and requirements of the law.

Political and religious preferences are a personal matter of employees and should not affect the performance of official duties and business communication with the colleagues. In the workplace it is not recommended to discuss issues regarding politics or religion unless it is caused by discussion of working situations.

Our company does not interfere with the participation of employees in political, religious, and social activities exclusively during non-working hours.

Employees of the company involved in political, religious, and social activities are obliged to act as individuals, not representatives of Ekoplast company.

Employees have no right to carry out political, religious, or social activities, using the resources of the company or its brand for this purpose.

Our company adheres to a strict neutrality policy regarding the political processes of the country in which it operates.

Ekoplast does not contribute funds or resources to any political parties, elected officials or candidates for public office and does not support any political campaigns.

#### <u>Corporate social</u> <u>responsibility. Charity.</u>

One of the main directions of implementation of corporate social responsibility of Ekoplast company is the policy of development and improvement of personnel conditions.

Our company annually publishes a report on corporate social responsibility on the company's website, which covers all its activities and achievements.

Ekoplast company cannot successfully develop, isolating itself from the processes of social development, taking place in the country as a whole and in the territories where our company operates.

We take responsibility for ethical compliance with those on whom the company directly depends in its professional activities.

It is important for Ekoplast to build a socially responsible business and thus we follow the following obligations:

- effectively interact with state and social institutions in order to adhere to mutual interests. The company strives to establish partnerships with the state, based on compliance with the law;
- promote the prosperity of the economy through timely and full payment of all taxes in accordance with the legislation of Ukraine:
- the company participates in solving social problems that it considers important and financially supports non-profit organizations.

Charitable activity of Ekoplast is also one of the directions of realization of corporate social responsibility.

Charitable contributions of Ekoplast company to non-profit programs of non-profit or charitable organizations (in particular, assistance in emergency situations, natural disasters, financing of educational and health care institutions, important scientific research, and other investments of non-commercial nature) are approved by the Company's Senior Management and subject to written approval. At the same time, Ekoplast requires reports from charitable or non-profit organizations on the targeted use of these funds to prevent corruption and commit to people in need.

#### **PERSONNEL POLICY**

Personnel policy of Ekoplast represents main directions and approaches of personnel management for the implementation of the company's mission and strategic goals, declared by the management.

The main purpose of the company's personnel policy is to increase the effectiveness of personnel management by creating an effective management system, based on economic incentives and social guarantees and contributions to a harmonious cooperation between the employees and the employer.

The main principle of personnel policy of our company is the principle of compliance of individual goals of employees with the goals of the company

The main components of Ekoplast's personnel policy are interrelated issues, which help to achieve the company's goals and implement the vision in the field of personnel management, in particular:

- improvement of the effectiveness of work at all levels;
- optimization and stabilization of the company's personnel and ensuring the effective use of their capabilities and potential;
- creation and development of personnel training and development system;
- formation and maintenance of a high level of loyalty of the employees;
- formation and strengthening of the company's corporate culture.

#### **Recruitment**

Ekoplast employee can be any adult person, whose values are compatible with the values of our company, and the level of education, personal qualities, professional experience correspond the requirements of the vacant position.

The basis for the procedure for recruitment is an application for recruitment, filled out by the head of the department and agreed by the director of Ekoplast the company

The application is issued for the new positions when expanding staff as well as at dismissal (replacement) of an employee.

The application is submitted with a detailed description of all criteria and professional competencies of the candidate for HR department, which organizes the process of searching and selecting candidates in accordance with the requirements, specified in the application.

The HR department forms a profile of the vacancy, which is posted on internet sites for job search, printed media, etc. Absolutely all vacancies of the Ekoplast company are posted on available resources for viewing by candidates, interested in finding a job. At the same time, an active search for candidates is carried out with all possible search tools used in HR activities.

In order to increase the effectiveness of recruitment, we practice multi-level interviews.

After deciding on the approval of a candidate for a vacant position, the HR officer sends an invitation to the candidate and enters the bordering process.

Upon reaching a bilateral agreement on employment, the employee of the HR department conducts the procedure of registration of labor relations in accordance with the current labor legislation of Ukraine:

Before registration of labor relations, the candidate must familiarize himself with:

- working conditions;
- their job (working) instructions;
- Code of Corporate Ethics;
- Regulations on trade secrets, confidential information and its protection;
- Regulations on prevention and counteraction to corruption at Ekoplast LLC;
- Ekoplast Policy in the field of quality, food safety, labor and environment protection;
- ❖ Regulations on the video surveillance system at Ekoplast LLC.

The candidate submits a standard package of documents for employment:

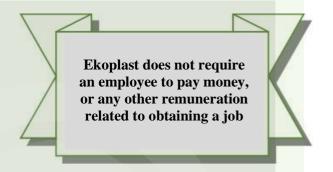
- passport;
- taxpayer card (ITN);
- education document;
- military ticket (for military-obliged);
- employment record book;
- \* medical certificate (if necessary);
- autobiographical questionnaire;
- **\*** application for hiring.

An employee of HR department makes photocopies of all the original documents (except for the employment record book, autobiographical questionnaire, application) and returns them to the candidate.

An employment contract is concluded with the employee in the form of an order, signed by the director and signed by the employee.

Before starting to work each new employee must be instructed on Ekoplast LLC equipment safety,

fire safety, occupational safety, and other mandatory briefings from those responsible for conducting these briefings.



#### **Staff adaptation**

The process of staff adaptation Ekoplast company has several stages.

The first stage of the adaptation process begins even before a new employee is hired – this is an introduction with basic rules of conduct, basic duties, values, and basic principles of the company.

The next stage of adaptation takes place in the workplace during the trial period, which allows you to determine the compliance of the worker or specialist with the work that he is entrusted directly in the work environment. The probation period allows the company to determine the professionalism of the employee, and the employee — to determine the compliance of the assigned tasks assigned to his/her own interests, abilities, and the desire to accept and adhere to the corporate culture of Ekoplast company.

The probation period is set under the agreement between the employer and the employee for a period that does not contradict the labor legislation of Ukraine:

- ❖ for workers up to 1 month;
- for specialists, engineers, managers up to 2 months;
- ❖ for heads of structural units up to 3 months.

The trial period does not include the days when the employee did not actually work, not depending on the reasons for the absence.

For the period of adaptation, which takes place mainly within the probation period, the head of the HR department, with the participation of the direct employee's manager, develops an Adaptation Program for a new employee. At the same time, the head of the department appoints a curator to the new employee and draws up a plan-evaluation of work with the criteria for passing the probation period. The new employee gets acquainted with the adaptation program before the beginning of the adaptation and puts his signature.

A mentor from among the company's experienced employees is appointed for new employees of working professions. In the process of using the method of mentoring, the main stages of learning are used, which can be described as follows.

Do it yourself, and I'll tell you

We'll do it together

I will show and you will watch

I will stell and you will listen

The head of HR department is the head of adaptation, so he/she regularly holds scheduled meetings with a new employee and the necessary questionnaires to find out the level of his/her work satisfaction and interaction with the team: whether the expectations and the real situation coincided, answers the questions of the about the newcomer, talks process communication and implementation in the team. At the same time, at any stage of adaptation, the new co-workers have the right to personally contact the head of HR department on adaptation or termination of labor relations.

The direct manager evaluates the employee's activities and concludes on the results of the probation period, interviewing employees who work closely with the newcomer one week before the end of the employee's probation period.

In case of a negative result of passing the probation period, on the basis of official documentation of the direct head of the structural unit, an employment contract is terminated with the employee, in accordance with the current labor legislation of Ukraine.

Ekoplast terminates the employment and makes a full settlement with the employee who wishes to terminate the employment relationship at any stage of adaptation.

With a positive result of the probation period, the employee continues to work at the company under the terms of his employment contract.

At the last stage of adaptation, the employee is evaluated, filling in the questionnaire of adaptation of the employee and undergoes a general interview with the curator, direct head of the department and head of the HR department. At the end of the adaptation of a key employee, the director of the company may be present at the general interview.

Adaptation of a new employee is considered successful if he/she has mastered the organizational structure, principles and management system, adheres to the rules of internal labor regulations, understands the Code of Corporate Ethics and shares the corporate culture of Ekoplast company.

## Staff training and Knowledge Base of the Company

Training of personnel at all levels is a necessary condition for the development of Ekoplast personnel and helps to strengthen its competitive advantage.

Learning is a stimulating factor:

#### 1. For the head of the company as an opportunity to:

- increase the productivity and quality of personnel work;
- systematically update staff knowledge;
- master the ability to identify, understand and solve complex work issues by personnel;
- form of personnel reserve;
- adapt the personnel to new conditions;
- effectively implement the innovations.

#### 2. For an employee of the company as an opportunity to:

- develop skills and abilities;
- maintain at the appropriate level or improve professional qualifications;
- acquire other professional knowledge outside the scope of the professional activity;
- \* increase value in the labor market:
- \* have personal development.

The organization of personnel training is within the competence of the HR department.

We practice mainly the following training methods:

**Internship** - training of an employee in the workplace under the guidance of a responsible person.

**Retraining** - training of an employee, who already has an education, a new specialty (profession).

**Professional development** - obtaining new knowledge, skills and abilities within the profession or specialty.

**Adaptation training -** training of an employee for the purpose of professional, social adaptation in the company, at the new working conditions.

**Training on labor protection** – according to the Regulations on the procedure for training and testing of knowledge on occupational safety in Ekoplast company.

Every year, at the beginning of the year, the company develops a schedule of personnel training, which considers all the necessary topics, both for internal training conducted by our trainers and external – in cooperation with educational service providers.

The personnel training programs necessarily include issues related to social responsibility: knowledge and understanding by personnel of the Company's Code of Corporate Ethics and the codes of our partners, hiring and termination of labor relations, disciplinary influence, prevention of discrimination in labor relations. Issues of occupational safety, fire safety, labor and environment protection are also mandatory.

The HR Department organizes documentary support, coordinates, and controls the educational process, and organizes periodic assessment of training effectiveness.

The results of the training are documented.

After external training, the company employee is obliged to transfer the acquired knowledge to colleagues who need this knowledge for professional activities.

Employees of our company have created an information and communication resource BuZuKa - a Knowledge Base of the Company, which consists of nine main sectors, filled with information about Ekoplast company.

For the transfer of knowledge, after training, all the training materials (in the form of presentations) are sent to the head of the HR department for inclusion in BuZuKa for free and easy access of the staff to update knowledge, if necessary.

The functioning of BuZuKa was launched with the aim of accumulating and exchanging professional knowledge and experience through the Company's Knowledge Base, accelerating work processes, easy adaptation of new employees and encouraging staff to self-development and self-control.

## Personnel assessment and personnel reserve

The purpose of personnel evaluation is the most rational use of the personnel potential, as well as a unique opportunity for the employees to adjust their vision of the business qualities and effectiveness of performing official duties.

When evaluating staff, we receive important information about:

- high-quality adaptation in the team;
- effective work of employees;
- potential opportunities for employees and prospects or professional growth;
- causes of inefficient work of individual employees;
- needs and priorities in training and advanced training;
- \* ways to improve the organization of labor.

We clearly understand that the employee's activity is important not isolated but in the context of the company's goals, so in the process of staff evaluation, we evaluate not the employee's personality, but the effectiveness of his/her work in the company, compliance with characteristics, personal qualities of the employee.

The object of evaluation may be all employees of our company with whom labor relations are concluded, regardless of the positions held or the work performed.

The main tasks of personnel assessment in the company are:

- determining the potential of the employee;
- formation of personnel reserve;
- improvement of internal communications (through feedback and partially open discussions of evaluation results);
- understanding the strengths and weaknesses of the employees themselves;
- understanding the value of the employee by colleagues and the manager;
- formation of a correct understanding of the assessment and correct behavior in order to avoid unwillingness to pass the assessment;
- comparison of own achievements with the results of other employees in order to increase their competitive ability;
- sharing common values;
- ❖ Informative: obtaining information by the heads of departments about their subordinates; identification of possible hidden conflicts between the head and subordinate; assistance in selfimprovement of employees through close attention to their needs, motives, talents, etc.

We have identified for ourselves the following types of personnel evaluation:

- > Incoming evaluation of the candidate
- > Assessment during adaptation period
- > Assessment while promoting
- > General evaluation of staff and their attitude to the company
  - > Analysis of the reasons for dismissa

Ekoplast independently determines the optimal approach to the personnel evaluation procedure through the introduction of those evaluation methods that will be the most appropriate and consistent in the selective application of methods, development of evaluation theory based on comprehensive and balanced analysis before evaluation.

The results of the assessment are:

- conclusions on the compliance of the employee with the position;
- recommendations on possible ways of working with employee development zones;
- changes in the position;
- \* raising or adjusting wages;
- revision of the incentive system and remuneration system;
- enrollment in personnel reserve.

The personnel reserve of the company is a group of employees, potentially capable of management activities, who, after appropriate training, can occupy certain positions.

The purpose of personnel reserve formation:

- promptly close vacancies or newly created positions;
- maintain continuity in the management system;
- timely fill management positions with trained staff;
- motivate staff to professional development;
- improve the work of all categories of personnel.

In Ekoplast company the formation of personnel reserve is based on the following principles:

**perspective** - personnel reserve is formed to meet both current and future needs;

**maximum** - training of reservists can be carried out for positions of any level;

**objectivity** - the results of professional activity, knowledge, skills and personal qualities of candidates are evaluated objectively;

**equal opportunities** - each employee can apply for consideration of enrollment in the personnel reserve and undergo an assessment;

voluntary - an employee can enter the personnel reserve only voluntarily, coercion and sanctions for disagreement are unacceptable;

**publicity** - information on the formation of personnel reserve and work with it is not hidden and available to all employees;

**personal responsibility** - employees enrolled in the personnel reserve are responsible for the implementation of training and self-development programs; the head who recommended the reservist is responsible for his successes.

The composition of the personnel reserve is reviewed and updated annually, considering the concept of the company's development and management of personnel needs, approved by the director.

#### **Staff remuneration**

Remuneration of the company's personnel is based on objectivity, individual contribution of the employee to achieve the general goals of our company. Each employee has the right to know the procedure and criteria for calculating his salary, as well as the individual procedure for payment of remuneration.

The procedure for calculating and the amount of wages, including remuneration, are not subject to discussion among employees of Ekoplast company.

The review of the employee's remuneration may be initiated by his direct manager on the basis of the successful activities of the employee, which is evaluated based on the results of his work during the established period of time, or based on the results of the professional evaluation procedure and submitted for approval to the HR department to make changes to the employee's remuneration system when approved by the company director.

Ekoplast company has the right to differentiate the size of salaries of specialists who perform similar work and occupy equal status positions. The basis for such differentiation is the qualification of the specialist, the success of the evaluation procedure and the effectiveness of work.

We do our best to keep employees' income competitive even under new market challenges and adverse circumstances.

In all the years of our company's activity, we have never violated the deadline for payment of salaries, including remuneration, to our employees and have always honestly adhered to the agreements on the amount of wages.

We are improving the remuneration and motivation system to encourage employees' interest in the effectiveness of their work activities and overall results of the company's activities, in the application of non-standard approaches in difficult situations and increasing staff loyalty to the company.

#### Working time and rest time

Ekoplast company develops and operates internal labor regulations, which clearly describe the schedules of working hours of personnel of all categories.

In order to start your working day on time (prepare the workplace and prepare yourself), the employee must be at the workplace at least 5 minutes before the official start of the working day.

Being at work after the official start of the working day is considered to be late.

If it is impossible to come to work on time for certain reasons, the employee must notify his/her direct manager about the problems in advance, or during the first hour from the start of the working day. Absence at the workplace during working hours for more than 3 hours during the working day without good reason and without notifying the direct supervisor is considered as absenteeism.

Systematic lateness of an employee to work or premature leaving of the workplace without warning his / her supervisor is a violation of labor discipline and leads to disciplinary action.



We care about the health of our employees, so we do not allow overtimes (only in cases stipulated by labor legislation), because it is overtime that leads to loss of effective performance and subsequently deterioration of well-being.

We value the privacy of our employees, so we do not allow them to be involved in work on their weekends, when employees plan to spend it for their own leisure or development, with friends or family, traveling or doing household chores.

Rest time is free from work within work schedules and during vacations.



At the request of employees, the following types of vacation are provided:

- ❖ annual basic leave 24 calendar days (persons with disabilities: 3<sup>rd</sup> group 26 calendar days; 2<sup>nd</sup> groups 30 calendar days);
- annual additional leave in accordance with the provisions of the Company's Collective Agreement;
- ❖ social leave: in connection with pregnancy and childbirth (for women) – 126 calendar days;
- social leave: to care for a child until they reach the age of three (both for women and for men);
- \* additional social leave for employees who have two or more children under 15 years – 10 calendar days;
- educational leave for employees who combine work with in-service training, according to the certificate-call of the educational institution:
- \* additional leave for combatants 10 calendar days on the basis of the certificate of combatant:
- ❖ leave without saving wages under the agreement of the parties 15 calendar days during a calendar year, regardless of the date of hiring.

Annual basic leave can be provided to fulltime employees in the first year of work at the company after 6 months of continuous work. In general, annual basic leave is provided to employees according to the company's approved vacation schedule. In our company, we strictly adhere to the rules for granting vacations and paying vacations in accordance with the requirements of labor legislation.

An employee submits an application with his manager's visa to the HR department 2 weeks before the start of the annual basic leave. The company director issues an order for granting the leave, which is mandatory for the employee and his manager, after which the accounting department calculates the vacation and pays the funds no later than 3 calendar days before the start of the vacation.

It is prohibited to replace the days of the annual basic leave with monetary compensation. Compensation for unused days (basic and additional) leave is paid only upon dismissal of the employee.

#### Looks of the employees

We respect the preferences, tastes, and habits of our employees regarding clothing and accessories, so we do not establish a clear dress code for the staff, but the company's management expects all employees to adhere to certain principles and rules regarding the looks.

Heads of structural units should serve as a model and ensure that subordinates adhere to the rules on the looks, as well as motivate employees to adhere to business style, showing taste, restraint, and correctness. At the same time, heads of structural units have the right to make personal comments about the looks of their subordinates.

The company's employees are guided by the following principles regarding the looks:

**accuracy** – neat and well-groomed appearance, clean and ironed clothes, polished shoes, neat hair are obligatory for each employee. Men should be shaved or have a neatly trimmed mustache / beard;

**restraint** – implies moderation and restraint in color solutions and decoration of clothes and shoes, accessories, moderation in makeup and jewelry;

**combinatory** – harmonious combination of all elements of the image (clothing, shoes, accessories):

adhere to the business style – strict or elegant attire should correspond to the business atmosphere of the office and strengthen the image of the company during business negotiations, meetings with customers and new employees of the company.

The basis of the individual image of each employee of the company recommends business style in clothes.

On Fridays, the company allows an informal, casual clothing style, but this does not apply to employees who have business meetings with clients or potential job candidates scheduled for Friday.

In demi-season periods and in winter, changeable shoes are recommended in the office.

It is unacceptable to be in the workplace in outerwear, as well as in hats (except for the necessary work instructions for the use of overalls).

It is forbidden to wear clothes and footwear that contradict business style: sports suits, beach shorts, T-shirts, beach shoes, open evening dresses, colorful beach sundresses, too short dresses or skirts, extravagant or transparent models of clothing that look provocative.

The individual image of employees who interact with customers and staff of the company should combine:

business style in clothes and make-up, polite and friendly style of communication, friendly attitude to clients, partners, and colleagues.

The company fully provides technical staff, which is involved in loading and unloading, equipment maintenance and repair, security, cleaning, as well as directly in the production and auxiliary work with uniform. During the working day, the company's technical staff is obliged to wear uniform.

Employees whose work is related to the maintenance and repair of office equipment are allowed to wear comfortable casual clothes in agreement with the direct manager.

#### **Workplace**

We strive to create the most comfortable working conditions for our employees. Order, cleanliness, neatness of the workplace create a favorable overall impression of the company Ekoplast and its employees.

Each employee must maintain cleanliness and order in his/her workplace and monitor the general order both in the office and in the workplace.

Any information for general access should be placed on the walls of the room in specially designated places. Printed publications such as diplomas, certificates, thanks or other awards should be placed in a frame with glass and placed in the office on the Wall of Success.

Control over the order and cleanliness of office space is carried out by the secretary, in the premises on the territory of the production and warehouse complex – by the head of the economic department, directly on the production – by the production manager.

It is forbidden at the workplace:

- to play computer and other games or engage in third-party activities that are not related to job or work duties;
- to take food, except for drinks (tea, coffee, juice, water) and sweets that do not leave crumbs (unless prohibited by work instructions, operating in production). Food intake is carried out in a specially designated and equipped place;
- \* to turn on loud music.
- to enable video broadcasts, online meetings, or headphone-free meetings unless all employees working side by side are involved in this process.
- to set loud ringtones on personal or corporate mobile phones. During working hours, employees are strongly advised to put the mobile phone in vibrating alert mode or reduce the volume to a minimum.

Documents that constitute trade secrets and confidential information of Ekoplast company or contain information about personal data of employees or contractors should not be accessible to unauthorized persons or employees who do not have access to them. These documents, after completing work with them, must be placed in safes or turnkey metal cabinets located in the workplace.

It is inadmissible to keep at the workplace:

- advertisements of products of competing companies;
- clothing, utensils, cosmetics;
- other things, not related to official duties.

Our company has implemented elements of the 5S "System of organization and rationalization of the workplace"

The 5S system consists of five simple steps:

Sort

**Set in Order** 

**Shine** 

**Standardize** 

Sustain

with which we try to optimize jobs, eliminate time losses, increase productivity, job security and, as a result, product quality, as well as improve the moral and psychological environment around.

We teach employees of our company to adhere to the elements of the 5S system to:

- make the workplaces comfortable and clean;
- \* make the rooms spacious and brighter;
- get rid of accumulated excess things, papers, garbage;
- reduce the time to search for the necessary tools, accessories, documentation;
- maintain the cleanliness and order that we have created at our workplaces, indoors, in production and the surrounding area.

Ekoplast welcomes a healthy lifestyle, so smoking and drinking alcohol in the workplace is prohibited Smoking is only allowed in designated and equipped areas. We warn of the dangers of smoking to health and promote getting rid of this habit by placing posters in smoking areas.

Alcohol consumption in the workplace during the working day, including lunch break, and not during working hours, but in the workplace - is prohibited. The direct head of the unit is personally responsible for compliance with these requirements by subordinates.

#### Meetings and gatherings

The management of Ekoplast conducts regular meetings and gatherings to ensure the prompt exchange of information among the company's divisions. The secretary of the meeting informs about the time, place and agenda of the next meeting, as well as the presence of participants by creating an electronic invitation in the meeting calendar, which provides periodic reminders of the event and venue, and allows you to respond quickly to possible changes.

In our company, meetings can be held both in person and remotely with the help of implemented computer programs in the mode of video conferences. Online meetings are implemented to save working time on meetings, involve employees, temporarily absent at the workplace, as well as in case of unforeseen circumstances, in particular, during quarantine.

Employees are required to attend or join meetings in advance. The absence or delay of the employee invited to the meeting, without a valid reason and early warning of the secretary of the meeting, is considered as a violation of labor discipline and, in some cases, may lead to disciplinary action.

The organizers of the meeting must have a pre-developed regulation and protocol to record the decisions taken.

All participants of the meeting should familiarize with the topic of the meeting before the meeting and be ready for discussion. It is important to be able to listen, respect the opinion of colleagues and be able to make a compromise solution to the problems.

Employees of the company in the meeting room, as well as in the office of the director of the company, should be without personal cell phones, exclusively with work related gadgets and diaries.

#### **Termination** of employment

Ekoplast company strictly adheres to the requirements of labor legislation on the procedure for termination of labor relations with personnel.



We value our staff and try to keep them, but Ekoplast has never prevented an employee from terminating his / her employment for any reason.

# COMPLIANCE WITH INTERNATIONAL STANDARDS AND CERTIFICATION

Ekoplast company has implemented an integrated quality and food safety management system, which is certified in accordance with the requirements of the Quality Management System ISO 9001:2015 and the Food Safety Scheme FSSC 22000

ISO – International Organization for Standardization. ISO International Standards promote trade, disseminate knowledge and innovative advances in technology, and help manage natural resources and conformity assessment practices.

ISO standards reflect the double level of consensus between market participants and between countries.

In fact, all regions of the world, despite the emergence of specific regional issues, have strong incentives to use international standards. These incentives encompass the obligation of WTO (World Trade Organization) members to ensure that products and materials, manufactured in their country can be sold with as little barriers to the global market as possible. Production of goods that meet international standards is a key element in ensuring such trade.

ISO 9001 is an international standard that establishes requirements for quality management systems for organizations, whose activities are aimed at improving consumer satisfaction through the effective application of quality management systems, including processes of continuous improvement of the system, which seek to ensure compliance of the quality of products (services) with the requirements of consumers,

including legal and regulatory requirements that may apply to the activities of this organization.

All ISO 9001 requirements are universal and are intended for use in all organizations, regardless of type, size, and products (services).

The current functioning of quality management systems and the presence of a certificate of conformity have provided significant advantages for our company, including:

- Increasing of the organization manageability
- reducing the costs, associated with the possible receipt of a shortage of products;
- increasing the number of loyal consumers and expanding the sales market;
- improving the company's image.

FSSC 22000 scheme is based on international ISO standards and additional requirements. set in the technical specifications for PRPs (pre-requisite programs) of the relevant sectors.

FSSC 22000 is one of the certification schemes for food safety management systems, which is fully recognized by accreditation bodies worldwide and created to harmonize certification requirements and methods in the chain of suppliers and producers of food products.

Passing the FSSC 22000 certification procedure and having a certificate allows our company to cooperate with large network companies around the world, due to the application of unified rules on food safety.

Built on the requirements of FSSC 22000 scheme, food safety management system and the availability of a certificate of conformity provided our company with:

- increasing of the competitiveness of our products, in particular, in the presence of the internationally recognized certificate FSSC 22000:
- opportunity to participate in the food chain for large international retail chains and deliver to customers who insist on independent verification;
- exclusion of obstacles to trade in the European and international markets and problems of mutual recognition of conformity assessment results in the field of food safety;
- acquisition of a marketing tool to increase the involvement of loyal consumers and new business partners;
- formation of the manufacturer's reputation of high-quality and safe products.

Demonstrating the company's ability to meet the requirements of ISO 9001 and FSSC 22000 scheme has been repeatedly confirmed by passing the certification procedure and obtaining certificates of conformity from independent competent and authorized international bodies.





Certification of the integrated quality management system according to ISO 9001 and the FSSC 22000 scheme allows us to objectively assess the effectiveness of our system and its functioning. At the same time, annually, we undergo supervisory audits, held by international certification bodies, to confirm the continued compliance of our management and food safety systems with the requirements of international standards ISO 9001 and FSSC 22000 and initiate its constant improvement.



At the same time, employees should understand the basic requirements of standards and the procedure for passing the audits, be aware of their importance in maintaining an existing integrated quality management system at the appropriate level and successfully passing subsequent stages of certification.

#### **INFORMATION SECURITY**

#### **Confidential information**

To protect business information, Ekoplast has implemented a policy on trade secrets, confidential information and its protection.

Confidential company information is information that is in the possession, use, disposal of the company, contained in contracts, agreements, letters, reports, analytical materials, statements of accounts, charts, schedules, specifications, etc., and the disclosure of which may be harmful, both to the interests of the company and to our partners, customers or suppliers.

The company's trade secret is information that is not a state secret and that reveals classified information about production technology, equipment, innovations, projects and development, management, financial and other activities of the company, the disclosure of which may cause significant economic or other harm to the company. Access to commercial information is available to the certain number of employees of the company with whom an agreement has been reached on non-disclosure of trade secrets.

All employees of our company are obliged to contribute to the protection of confidential information of Ekoplast and its business partners, which became known to them in the process of work in the company. It is forbidden to disclose confidential information and cover its composition in private conversations, or in the circle of persons who are not employees of the company and family members, except in cases when commercial benefits are discussed with the management of the company.

Ekoplast respects the right to privacy and promotes the protection of confidential information of its customers, suppliers and partners, as well as prevents its accidental disclosure

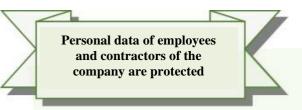
Every employee of the company is obliged to read the policy on trade secrets, confidential information and its protection and strictly adhere to its provisions when concluding an employment relationship.

#### Protection of personal data

To protect personal data, Ekoplast has developed and implemented a policy on the protection of personal data of employees and counterparties since 2017, which is based on the Law of Ukraine "On Personal Data Protection".

Ekoplast owns the personal data of its employees and contractors, which includes any information about an individual by which he/she can be specifically identified.

The company does not process information about the racial, national or ethnic origin of the employees, their political, religious beliefs, membership in political parties, intimate information concerning private life.



We have committed to ensuring the protection of personal data of employees and contractors, so all employees who have access to personal data and process them in the course of their work activities, but are not the managers of this data, conclude obligations on non-disclosure of personal data and prevent their accidental loss or destruction.

We guarantee the protection of personal data of our employees and contractors from unlawful processing and accidental loss, destruction, damage due to intentional concealment, non-provision or untimely provision, as well as protection against providing information that is inaccurate or discredits honor, dignity and business reputation of the person.

# EKOPLAST

#### **COMPANY OWNERSHIP RIGHTS**

## Ownership rights to property and land

Ekoplast company respects the rights to property and land of people, indigenous peoples, regions, and other entities.

We strictly adhere to the legislation of Ukraine, in particular, which regulates land and property relations, namely the Constitution of Ukraine, Land and Civil Codes of Ukraine, as well as regulations adopted in accordance with them, which state that the grounds for the emergence and termination of rights to land and rights to immovable property located on it are statutory legal facts, confirmed by relevant documents.

Ekoplast confirms its ownership of property and land with documents that meet the requirements of Ukrainian legislation

- Certificate of ownership of immovable property;
- Long-term lease agreement for the land plot, concluded with local self-government bodies.

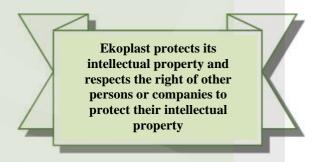
Ekoplast verifies the legality of ownership of land, property, and all related transactions by a legal adviser with the necessary specialists or third-party competent organizations to comply with all legal, social, and environmental requirements. The legal adviser has the authority to communicate with the owners of the company on all legal aspects related to land and property issues.

Ekoplast company does not support, does not accept and does not recognize the seizure of land and property.

The company systematically conducts legal checks on the preservation of the established rights of individuals or indigenous people to property and land.

Ekoplast recognizes the ownership of land and property of their rightful owners.

#### Intellectual property



Protection of intellectual property of our company promotes the use and further development of inventive and creative talents and achievements, supports and preserves the professional potential of the staff.

The intellectual property of Ekoplast mainly includes:

- industrial property rights;
- corporate and commercial names.

The presence of intellectual property provides our company with a certain advantage in the market due to its uniqueness and requires protection against unauthorized disclosure and use.

Infringement of intellectual property rights, such as:

- piracy;
- plagiarism;

- unscrupulous registration;
- unfair competition;
- forgery or alteration of information

in particular by the company's employees, through disclosure of trade secrets, copying documents for the purpose of transferring to third parties who may have commercial benefits from this, entails liability in accordance with the norms of the current legislation.

Legal protection of the company's intellectual property is carried out at the legislative level, and in case of misconduct of employees is the basis for termination of the employment contract.

Employees of the company are obliged to comply with the same requirements for the preservation of intellectual property and in relation to the intellectual property of our customers and partners.

Our company does not knowingly infringe the copyrights of third parties. The use of unlicensed software, use or reproduction of copyrighted materials without permission or bypassing an existing patent is prohibited.

## <u>Use of the company's</u> property and resources

Employees of Ekoplast are obliged to take care of the company's property and use its funds and resources sparingly. It is forbidden to use the property and resources of Ekoplast for any personal benefit, as well as to perform work for an external party, not related to the activities of our company.

Ekoplast has the right to monitor and verify the use of e-mail, the Internet and other means of electronic communication by personnel (within the framework of the legislation on the protection of personal data) when suspicion of their misuse happens.

Computers, networks, as well as the company's electronic communication facilities, production equipment and should be used for professional purposes in accordance with the instructions of Ekoplast.

If an employee has access to the information and communication systems of Ekoplast company, he/she is obliged to take necessary precautions to prevent unauthorized access to the system.

Company employees are obliged to ensure protection and non-disclosure of their passwords and other types of access to network systems and means of communication

Employees must not use or distribute licensed programs outside Ekoplast, use illegally purchased software, or distribute genuine software media or illegal copies of non-licensed or unlicensed software.

Personal international calls from Ekoplast's phones at its expense are prohibited. Such calls must be authorized by the immediate supervisor. The use of international communication for personal purposes should be subsequently compensated by the employee.

The use of office equipment and the use of the Internet for personal purposes, without the special permission of the immediate supervisor, is prohibited.

# SAFETY OF WORK AND ENVIRONMENTAL PROTECTION

### **Environmental protection**

Our company demonstrates a responsible attitude to the environment: we strive to minimize the impact of production activities on the environment by applying socially responsible, scientifically sound, and economically feasible methods.

We strive to participate in programs of savings, recycling and energy conservation, the purpose of which is to keep air and water clean, reduce the amount of waste and rationally use natural resources.

Our company adheres to the implementation of principles, programs and methods, aimed at conducting activities in environmentally safe ways.

At the same time, Ekoplast:

- implements principles, programs and methods aimed at environmental protection in all spheres of its activity as integral elements of management system;
  - takes into account the need for efficient use of materials and electricity, careful attitude to resources, minimization of adverse environmental impact when commissioning new equipment;
  - in conducting its activities pays considerable attention to the reduction of waste, their sorting, as well as the use of safe methods of disposal;
- respects and adheres to applicable laws and regulations in the field of environmental legislation, in particular environmental protection.

We are improving environmental protection measures, the need of which is caused by the activities of our company:

- detect, evaluate and carry out constant monitoring and possible restriction of the release of harmful elements into the atmosphere;
- we review regulatory acts in accordance with the changes in legislation and improve the range of environmental measures.

These norms and rules of ecological and labor safety are defined and fixed in the Ecological passport of Ekoplast company, which contains the general information on the enterprise, the used raw materials, the description of technological schemes of production of the basic kinds of products, schemes of sewage treatment and emissions, their characteristics. after cleaning;

data on solid and other wastes, as well as information on the availability of technologies in the world that ensure the achievement of the best indicators of nature protection.

The employee of the company, responsible for compliance with the requirements of environmental legislation, participates in filling out and issuing an environmental passport, considering the total impact of harmful emissions into the environment.

Ekoplast includes only objective environmental indicators in reports for the Department of Environmental Resources and Ecology.

## **Occupational** safety

Our company strives to prevent accidents, injuries, and work-related diseases, and therefore takes care of its employees, contractors and all persons who cooperate with us.

Occupational safety in our company is based on the general principles of priority of life and health of staff, full responsibility of the employer for the creation of appropriate, safe and healthy working conditions and compliance with current legislation on labor protection

The company's labor protection service monitors the safety of our employees by implementing a set of measures to prevent injury, diseases and accidents at work:

- training of employees, timely conduct of briefings and control of knowledge on labor protection;
- development of a plan of works and technical maps in accordance with the conditions of labor protection;
- proper job planning;
- proper maintenance of passages;
- compliance with the rules of work and admission to work;
- ❖ correct organization of work: comfortable working posture, alternation of work and rest, lack of physical exertion;
- \* application of safe ways of work;
- compliance with the established technological process;

- the serviceable state of collective and individual protection means;
- availability of appropriate security signs;
- application of technically perfect and serviceable equipment, tools and devices:
  - \* research of the impact of production factors on humans and determining the compliance of conditions in the workplace with the requirements of regulatory documents;
- mandatory prior and periodic medical examinations for certain categories of workers to preserve their health.

Our company carries out activities aimed at constant readiness for emergencies. The company has procedures for informing and evacuating employees, regularly conducts training in emergency situations and briefings. All working premises of the company are provided with appropriate first aid kits, fire detection and extinguishing means.

Employees of Ekoplast are obliged to notify the labor protection service and their direct manager about any accident at work or about the case of environmental pollution in accordance with the instructions of the company and applicable law.

## <u>Health care</u> <u>HIV/AIDS status</u>

Ekoplast respects the right of employees to the protection of personal private information, and therefore does not require job seekers or employees to disclose information related to HIV/AIDS, unless such a requirement is required by applicable law.

The disclosure of such information is possible only on a voluntary basis, in particular, if the state of health does not allow to fully perform work duties.

HIV/AIDS infected employees can continue to work and expect equal opportunities in training, encouragement, promotion and other social security on a common basis.

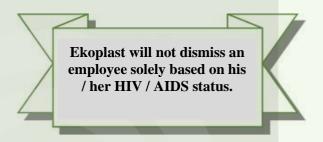
If an employee opens information about the HIV/AIDS status, Ekoplast company, at his/her request, can take measures to create appropriate conditions for an employee infected with HIV/AIDS:

- change of work schedule;
- provide additional breaks;
- provide additional free time for medical examination:
- establish part-time work;
- temporary transfer to an easier job (in case of available vacancy);
- provide annual paid leave outside the schedule:
- \* return to full employment.

Ekoplast strives to ensure safe and healthy working conditions, including the use of precautions, as well as the purchase of first aid products.

In our company, all first aid kits are equipped with medicines for medical care to prevent HIV / AIDS. First aid for the prevention of infection is provided in accordance with the company's instructions on first aid for the prevention of HIV infection.

Ekoplast does not require a medical examination to confirm the absence of HIV/AIDS status, both during employment process and during work activities in the company.



In case an employee infected with HIV / AIDS interferes with the performance of his / her duties or is medically unable to continue working, the employment relationship between the employee and Ekoplast may be terminated in accordance with current labor legislation of Ukraine.

## **SCOPE OF THE CODE**

# Responsibility for compliance with the Code

The Code of Corporate Ethics applies to all employees of the company without exceptions.

The Code obliges every employee of the company in response to trust and employment, voluntarily take responsibility and carry out their professional activities, aimed at forming financial stability and strengthening the company's image, in particular, by achieving effective and comfortable professional relationships with colleagues, clients and business partners

Ekoplast is also trying to bring the basic principles of ethical conduct specified in the Code to the attention of its customers and business partners and expects them to adhere to similar ethical standards.

All employees of the company are obliged to demonstrate responsible and ethical conduct, consistently adhere to the principles of the Code, consistently implementing them in their daily work. serve as a model of positive treatment for other employees.

The Code of Corporate Ethics can guide employees in situations of conflict, ethical uncertainty and other circumstances of moral choice and act as a means of public control over the moral appearance and professional conduct of employees. This Code cannot provide comprehensive answers to all questions, so we must rely on conscientiousness and common sense.



Ethical compliance work is coordinated by the company's Chief Human Resources Officer, who is a senior management executive on social responsibility.

The director of the company solves fundamental ethical problems on the scale of the company, as well as disassembles cases of ethical violations and ethical conflicts that cannot be solved at previous levels.

The employee of the company is personally responsible for:

- achieving the company's and division's strategic goals, fulfillment of tasks in accordance with the level of professional competence and delegated powers;
- quality of work performed, literacy, correctness and practicality of the drawn up documents, exact fulfillment of contractual obligations;

strict implementation of the principles of this Code. Compliance with the Code is ensured by the daily activities of the employee.

Violation of the provisions of the Code can be considered as an action incompatible with the status of Ekoplast employee and serves as a basis for disciplinary action.

#### I know the Code

When employing in our company, each employee is obliged to read and understand all sections of the Code of Corporate Ethics in order to further adhere to the ethical principles of management in their work activities.

The first acquaintance with our Code does not make it possible to fully understand how to apply the principles and norms of the Code in the work. Many fundamental principles of ethical conduct in the Code sound like slogans and give the impression of the need for strict adherence to them. For this purpose, the company has introduced additional study of the Code through training with presentations for all employees and an annual update of knowledge.

Compliance with ethical standards is one of the criteria for individual evaluation of company employees.

#### I know the Code if:

- ❖ I know from which sections the Code has:
- I know the principles of business ethics of Ekoplast company;
- ❖ I understand the degree of responsibility for compliance with the Code;
- ❖ I know what international standards Ekoplast is certified for;
- ❖ I know how Ekoplast adheres to the safety of its employees;
- ❖ I know how to send an appeal or comment;
- ❖ I know who I can contact in case of violations of the company's ethical standards:
- ❖ I am not afraid to make comments to colleagues about violations of the Code;
- ❖ No one can make me break the Code.

The company's top management reserves the right to conduct regular inspections of employees' compliance with the guidelines of this Code and current policies of Ekoplast.

# Seeking guidance and recommendations

The employee has the right to maintain the anonymity of his/her oral or written request. Violation of this right is a violation of the ethics of Ekoplast company.

If an employee has doubts about the interpretation of the Code or the possibility of its application in a particular case, or there are reasonable suspicions that any of the employees violates the ethical standards of the company, he/she must apply to one of the following instances under the following rules:



An employee of Ekoplast may orally address his/her immediate supervisor, and in case of impossibility or unwillingness of the manager to provide explanations, send his/her requests to the following instances in one of the following ways:

Boxes of requests and offers, located in the production site and the office of the company;

#### Post

by mailing to 29017, Ukraine, Khmelnytskyi, postal box No. 393

#### ❖ E-mail:

personal@ekoplast.ua - representative
of the Senior Management on Social
Responsibility;

<u>yurist@ekoplast.ua is</u> the legal service of the company.

#### **\*** Telephone:

office phone numbers:

+38(0382)637005; +38(0382)637081

corporate mobile phone of the Representative of the Senior Management on Social Responsibility +380673803546

For customers, suppliers or third parties who cooperate with us, as well as business partners, we offer any of the following methods of communication:

#### Phone/Fax:

+38(0382)637005;

+38(0382)637081

#### **❖** Post

Postal address: 29017, Ukraine, Khmelnytskyi, postal box No. 393

#### **Courier delivery**,

Office address: 29017, Ukraine, Khmelnitsky, 5/3 Zarichanska Str., office 301

\* E-mail: info@ekoplast.ua

**\*** Application form on the company

website: www.ekoplast.ua

#### • I will report my concerns:

Employees are encouraged to openly report any suspected violations of the Code. The Company guarantees that none of the employees have ever encountered or will face in the future any form of influence or adverse consequences for asking for advice or honestly reporting violations of the Code.

Regardless of the method of notification that the employee chooses, his/her message will be considered immediately. In relation to all cases of the Code violation, which became known, a fair investigation will be carried out. The results of the investigation will be reported to the employee who filed a complaint or notification or, in the case of incognito, the results of the investigation will be made public at the general meeting or on the bulletin board without identification.

All detected facts of the Code violation will be analyzed and eliminated. The company analyzes the effectiveness of the measures, taken to eliminate violations.

I will report my concerns if:

- some principles of the Code are not clear to me;
- I see a discrepancy between the principles and actions of ethical conduct:
- ❖ I became aware of violations that can lead to serious consequences;
- I became a participant in a work conflict that lasts more than 7 calendar days and goes into a hidden conflict;
- my colleague does not adhere to the principles of the Code, which complicates the workflow or teamwork, and ignores comments:

- direct manager neglects the rules of ethical conduct;
- direct supervisor exerts pressure on me or my colleague to conceal violations of the Code;
- direct manager refuses to provide an explanation of the corrective actions in certain situations:
- ❖ I did not receive clarifications regarding my request from any of the instances.

The company's employees should facilitate investigations and tell the sincere truth. If an employee evades these obligations, he/she might face disciplinary actions and possible dismissal from the company.

# The Code is an integral part of the Internal Labor Regulations

Company Code of Corporate Ethics is developed on the basis of generally recognized principles and norms of business ethics and does not contradict the requirements of the current legislation of Ukraine. The Code does not describe all possible cases and situations that an employee may encounter when performing his official duties but contains basic principles for solving complex ethical situations.

The Code formulates and systematizes norms and principles of conduct that must be followed by all employees of the company..

Any Code violation, even a minor one, can damage the reputation of our company, which is unacceptable.

Therefore, liability for violations of the Code of Corporate Ethics is equal to liability for violations of the Internal Labor Regulations,

because the Code is an integral part of these Rules for the ethical conduct of personnel.

# Amendments to the Code

The Code of Corporate Ethics may be supplemented or amended, taking into account current changes within the company or abroad, by the decision of the Senior Management of Ekoplast.

A full revision of the Code takes place every four years within the period of revision of the Internal Labor Regulations.

The text of the Code is permanently available on the website of the company and the internal information and communication resource of the company - BuZuKa.

Printed copies of the Code may be found in each structural unit of the company for free access of all employees.

Each employee needs to study the Code and sign the "Agreement on ethical principles and norms of the Code of Corporate Ethics of Ekoplast".

The signed copy of the Consent is stored in a separate folder according to the requirements of preserving the personal case of the employee.



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# EKOPLAST



Khmelnytskyi Ukraine 2021