



DOING THE RIGHT THING
CODE OF CONDUCT

Pro-Pac Packaging Limited Group
ABN 36 112 971 874

ABOUT OUR CODE OF CONDUCT

At Pro-Pac our behaviors and actions are guided by our values. We must concentrate not only on achieving results but also on how we get things done. This handbook explains your responsibilities as a representative of Pro-Pac and the common rules we have about the way we behave at work.

Pro-Pac is committed to:

- acting in the best interests of our customers, shareholders and fellow colleagues;
- meeting the highest standards of behavior and appearance;
- complying with the law and with company policies;
- protecting company assets, information and reputation;
- being respectful, friendly and safe;
- conducting business fairly, truthfully and honestly.

To help us achieve these objectives, there are three things I ask of you:

1 READ IT

Please read our Code of Conduct and make sure you understand it. If there is anything you are unclear about, it is your responsibility to ask.

2 AGREE TO IT

You acknowledge that you clearly understand and agree to abide by the rules and responsibilities set out in our Code of Conduct.

3 FOLLOW IT

It is your responsibility to always work within the rules, as described by our Code of Conduct.

If you have any questions about any aspect of our Code of Conduct, please don't hesitate to talk to your Manager or Human Resources.

Thank you for being a part of the Pro-Pac team

Tim Welsh

Chief Executive Officer and Managing Director



Doing the right thing

It is our employees, "Doing the Right Thing" every day, by our customers, our communities, our suppliers and each other that makes Pro-Pac Packaging a great Company.

This Code of Conduct has been developed to help all of us enhance the company's reputation by explaining how our legal, moral and ethical standards can be achieved every day through our behaviours and our choices.

Our Code of Conduct is for all employees, directors, contractors and consultants of Pro-Pac Packaging Group.

It is everyone's responsibility to individually uphold the Code of Conduct and to encourage each other to do the same.

If you have any questions or concerns about any of the detail in this booklet, please discuss with your manager or contact Human Resources.

Published on 31 July 2019

ABOUT OUR CODE OF CONDUCT

Doing the right thing is demonstrated by acting with integrity, honesty and trust at all times - at work, when representing the company and outside working hours.

Unacceptable conduct includes, but is not limited to:

- possessing or consuming alcohol or illegal drugs during working hours;
- working under the influence of illegal drugs or alcohol;
- using objectionable or obscene language or gestures towards others;
- behaving in a fraudulent and dishonest manner;
- breaching the rule and spirit of the laws that govern us
- falsifying company documents;
- making unauthorised statements or providing unauthorised information to media;
- inappropriate use or disclosure of Company information, systems or assets;
- posting of inappropriate, false or malicious comments or materials regarding the company, your workplace, your colleagues or customers. This includes but is not limited to social networking sites, emails and text messages.



EMPLOYEES ARE REQUIRED:

To behave in a manner which is consistent with the Pro-Pac values, whether that is in your usual workplace, when performing company duties off site, on social media, when interacting with customers and suppliers, on company business trips, or at company functions such as Christmas parties

Failure to do so may result in disciplinary action, including termination of employment.

SOCIAL MEDIA

Just like our words and actions, messages and graphics in electronic form can be offensive.

ENSURE THAT YOU:

- Do not send racial, sexual, defamatory, threatening or obscene messages to any employee or anyone outside the Company;
- Do not download, retrieve, send or store inappropriate, sexually explicit or racist material on your computer or other company electronic device;
- Do not instigate or distribute 'junk or chain' mail that can congest the network and inhibit the free flow of business information.
- Failure to comply may result in disciplinary action, including termination of employment.

YOU MUST ENSURE YOU:

- Carry out your duties in good faith, always following relevant policies and procedures;
- Complete the training applicable to your role and raise anything you don't understand with your manager;
- Do not engage in behaviour, or ignore behaviour by others, which breaches compliance requirements;
- Promptly raise issues or suspected breaches with your manager and support their resolution



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WORKPLACE BEHAVIOUR

At Pro-Pac, Doing the Right Thing means we are all responsible for fostering a working environment where everyone is treated with dignity, courtesy and respect.

This includes not engaging in conduct or behaviour which is bullying, harassment or unlawful discrimination in the workplace.

Team members should be aware that conduct that is found to be bullying, harassment or discrimination could be a breach of legislation.

Some examples of harassing behaviours include;

- Displaying offensive material (including non -electronic format)
- Unwelcome physical contact such as shoulder massaging
- Offensive or demeaning statements, jokes, comments or innuendo
- Unwelcome remarks or insinuations about a person's appearance, sexual activities or private life

Some examples of bullying behaviours include;

- Abusive, insulting or offensive language or comments
- Spreading misinformation or malicious rumours
- Behaviour that belittles and/or humiliates
- Unreasonable exclusion from workplace activities

Bullying does not include reasonable management action taken in a reasonable way, such as;

- Informing a team member about unsatisfactory work performance
- Reasonable directions by management

Unlawful discrimination is the less favourable treatment of a person or group of people based on particular attributes.

Some examples include:

- Sex, marital status, pregnancy, parental status or carers' or family responsibilities
- Ethnicity or religion
- Disability or impairment, and/or age

Always be aware of your behaviour

- As harassment, bullying and discrimination can be carried out in a number of ways including verbally, in writing, through email, text messaging, instant messaging, being published on the internet, videos or other social media channels.
- Failure to comply with these obligations may result in disciplinary action, including termination of employment.



EMPLOYEES ARE EXPECTED:

- To raise the matter with your manager if you believe you are experiencing unlawful discrimination, harassment or bullying. If you are unable to do so, you can also speak to Human Resources
- Not to victimise or otherwise disadvantage anyone as a result of making a complaint.
- To act honestly when raising a complaint and if you become involved in an investigation, you are required to keep anything discussed confidential

WE ARE WHAT WE WEAR

You are expected to dress appropriately during work hours or when representing the company.

This includes:

- Wearing the preferred appropriate work attire;
- Wearing appropriate protective or safety clothing when required;
- Being clean, tidy and maintaining personal hygiene and grooming;
- Wearing the correct Pro-Pac items of uniform when required

You are not to use personal electronic devices when undertaking activities that may harm yourself or anyone else.



SAFETY BELONGS TO US ALL

The journey to achieve and sustain world-class safety performance has no end point.

AT PRO-PAC, OUR COMMITMENT IS ONGOING, AND WE AIM TO PREVENT ALL INCIDENTS.

The safety, health and welfare of employees, contractors, customers, suppliers and members of the wider community is of prime importance to us. We strive to create a culture where all employees believe it is essential to work safely for themselves and each other.

- It is everyone's responsibility to ensure that you comply with Safety and Health policies and processes at all times to protect your health and that of others from potential hazards.
- If you see an unsafe act, you are responsible for identifying and reporting the hazard to minimise any potential risk. If you are in doubt about safety issues you should speak to your manager for assistance

SAFETY BELONGS TO US ALL

Pro-Pac encourages you to:

- Make safety personal and ask, "what can I do to help"?
- Know no task is so urgent and no service is so important that we cannot take time to do it safely;
- Be responsible for your own safety and health and that of co-workers, contractors, visitors and customers;
- Be mindful of the environmental impact of our activities and choices;
- Recognise and promote excellence in safety, health and environmental performance.

MY PERSONAL COMMITMENT TO SAFETY:

- I will look out for my safety and the safety of others;
- I will immediately stop any job or task that I believe is unsafe;
- I will always address hazards when I become aware of them;
- I will adhere to the Company's safety - rules;
- I will not use equipment that I am not trained or authorised to use;
- I will always wear Personal Protective Equipment (PPE) required for the task;
- I will report all incidents and injuries immediately.



CONFLICTS OF INTEREST

All employees of Pro-Pac are expected to declare any interest they might have that could adversely affect the Company.

In some cases, our individual interests may put us in direct conflict with those of the company and this could cause unnecessary embarrassment for us or for the company's reputation in the marketplace.

Pro-Pac expects that any direct working relationship between family (including parents, siblings, spouses and partners) be declared. Pro-Pac's expects that no employee is involved, whether directly or indirectly, in a competitive business. It is important to ensure that no one

puts themselves into a position where a potential conflict of interest may exist. If you find yourself in this situation, ensure you declare it immediately to your Manager or Human Resources.

Over time personal situations may change and employees who believe they are in a situation that may be a potential conflict with Pro-Pac are required to advise their manager.

If you are concerned about your own situation it is recommended you talk to your manager so the issue can be clarified and resolved.

Failure to disclose or resolve a conflict of interest is a serious issue and may lead to termination of employment.

A photograph of a worker from behind, wearing a bright orange safety suit and a blue hairnet. The worker is standing in front of a large industrial machine with multiple rollers and a yellow warning sign. The machine appears to be processing a large sheet of material, possibly paper or plastic. The background is slightly blurred, showing more of the industrial environment.

YOU SHOULD DISCLOSE ANY DEALINGS THAT MAY MEAN YOU:

- Do business with or are employed by a company that is a competitor of Pro-Pac;
- Do business with a supplier because they have given us a gift or benefit;
- Seek to run for, or, hold a public office that may impact the Company;
- Work for a competitor while being employed by Pro-Pac or its subsidiaries;
- Have an immediate family member employed by a direct competitor in a senior role.

WHAT SHOULD I DO IF I GET OFFERED A GIFT

If you receive a gift or invitation you should declare it immediately to your manager. If it is under A\$100/NZ\$100 in value, advise your manager. If it exceeds A\$100/NZ\$100 in value, you need to seek prior approval from your General Manager before you accept it.

Pro-Pac is committed to ensuring all business relationships with suppliers are legal and based on professional integrity.

As a matter of company principle, we do not receive gifts and gratuities. We understand, however, that small tokens of goodwill may be exchanged between us and our suppliers on special occasions, such as Christmas, and that from time to time you may be offered an invitation to a social, sporting or cultural event because of the job that

you do. Gifts such as these can be accepted provided, they do not exceed A\$100/ NZ\$100 in value or result in personal gain for the recipient, or favourable treatment for the giver if they are someone from whom we buy, sell or receive goods and services.

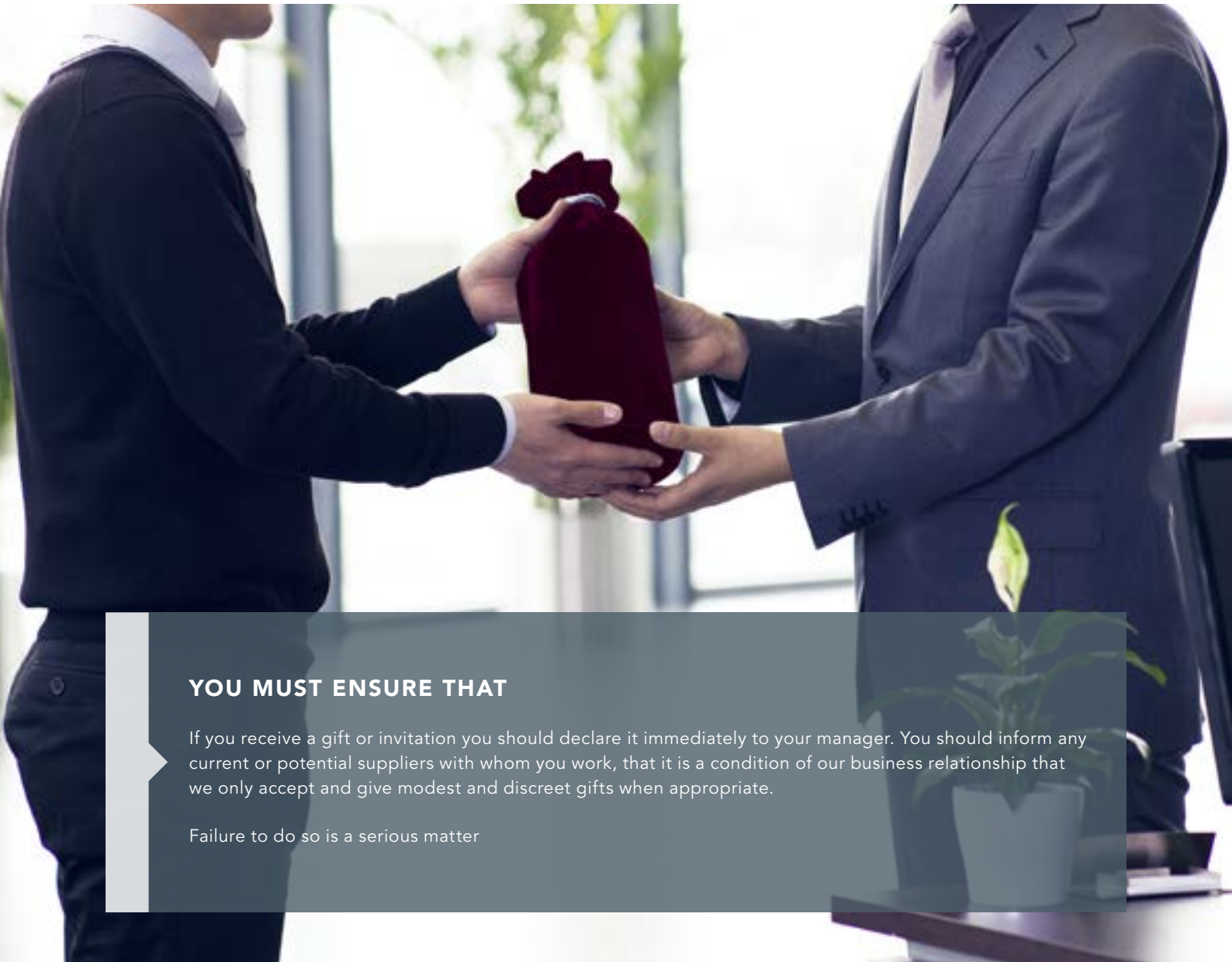
Accepting some types of gifts and gratuities like bribes, inducements, special personal discounts or merchandise, however small, could embarrass an employee, the supplier, and compromise Pro-Pac. In some cases, these gifts could be interpreted as fraud and be illegal.

The company has an obligation to fully cooperate with any investigation by law enforcement or regulatory authorities in cases where employees knowingly accept a gift that has been interpreted as a bribe. If you are unclear about what is acceptable behaviour in relation to gifts and gratuities you should talk to your manager.

YOU MUST ENSURE THAT

If you receive a gift or invitation you should declare it immediately to your manager. You should inform any current or potential suppliers with whom you work, that it is a condition of our business relationship that we only accept and give modest and discreet gifts when appropriate.

Failure to do so is a serious matter



BUYING RESPONSIBLY

We are committed to acting fairly and honestly in all dealings with suppliers, customers and the community. You are expected to uphold and support this commitment.

When we buy for our company it must be done fairly and responsibly.

Our suppliers and trade partners are key to our ongoing success and we must treat them with respect.

Employees that are involved in buying goods, including non-inventory items and services for Pro-Pac need to do business fairly and ethically with suppliers by:

- Obtaining the best value for money from all trade arrangements but never at the expense of acting ethically;
- Never accepting or demanding any form of inducement or bribe in return for business;
- Never placing undue pressure upon our suppliers;
- Never trying to influence competitor pricing or deals offered by suppliers to our competitors;
- Never being influenced by our suppliers to fix our prices;
- Regularly reviewing our trade partners' contractual arrangements; ensuring that our buying and procurement processes are transparent and in with our Ethical Sourcing Policy

IT IS YOUR RESPONSIBILITY TO COMMIT TO COMPLYING WITH THE LAWS GOVERNING COMPETITION BY:

- Ensuring we trade independently of our competitors, by not discussing, agreeing or reaching understandings with our competitors about our activities;
- Ensuring we price our products and services to provide a compelling offer to our customers in the spirit of sound competitive behaviour

It is your responsibility to treat our customers fairly and with respect by:

- Valuing their feedback;
- Ensuring our marketing and promotional information as well as our product packaging and labelling is clear and truthful.

It is your responsibility to treat product safety as paramount by:

- Ensuring the products, we supply are safe and meet regulatory requirements, including safety warnings and labelling;
- Taking accountability for your part in the delivery and quality of products;
- Treating product recalls as a priority by being thorough in preventing their sale and informing our



MEDIA AND EXTERNAL STAKEHOLDERS

The way in which we conduct ourselves at work and the decisions we make can have a direct impact on the company's reputation.

Our aim is to always ensure that our impact is a positive one, rather than a negative one. It is therefore your responsibility to behave in a manner that represents Pro-Pac as a good corporate citizen.

After all, a good reputation is very hard to earn but very easy to damage.

To ensure that you do not inadvertently risk the Company's reputation, it is important that you do not:

- Make statements or provide information to media
- Without prior authorisation from the Group Chief Executive Officer;
- Provide information to politicians or government officials;
- Post inappropriate, false or malicious comments or materials regarding the company, your workplace and/or your colleagues;
- Reference the company negatively in any social medium or public forum.

POLITICAL ACTIVITIES

Pro-Pac respects the rights of its employees to participate in the political process but is mindful of any potential conflicts of interest.

It is important for us all to know that the Company is not allowed to offer or give gifts, loans, rewards or favours to any government official or government employee with a view to favourable treatment in return.

You are expected to respect the Company's stance on this issue particularly in cases where you work with local or overseas government representatives.



Being a company shareholder brings a responsibility to comply with the laws governing companies and employees who own Securities, including insider trading laws and the Company's Securities Trading Policy as amended from time to time. In practical terms, importantly, you need to be aware that, at certain times of the year, you must not trade securities. These times are called "Blackout Periods"

The insider trading laws do not allow anyone with "inside information" to:

- Trade in (i.e. apply for, buy or sell or agree to, apply for, buy or sell) the Company's
- Securities or influence another person to trade in the Company's Securities;
- Communicate the "inside information" to another person who may trade in Pro-Pac Securities.
- You are not allowed to use "inside information" to trade in Securities in other companies if the information you know may generally effect the price or value of those Securities.

These prohibitions also apply to anything you do on your own behalf or on behalf of another person. These prohibitions cannot be avoided by another person doing things on your behalf.

The Securities Trading policy is available on the company's website.

WHAT IS INSIDE INFORMATION?

Inside information is any information known by an employee that is not generally available and that, if it were generally available, a reasonable person would expect it to have a material effect on the price or value of Pro-Pac Securities or the securities of any other company. In simple terms, this means information which might influence someone to decide whether or not to buy or sell Securities.

A reasonable person would expect information to have a 'material effect' on the price or value of Securities if the information would, or would be likely to, influence someone when deciding whether or not to buy or sell those Securities.

Examples of information that might be inside information include information relating to:

- Financial performance; a material acquisition or disposal of assets, a takeover or merger;
- On new share issue or change to capital structure;
- The entry into or termination of a material contract;
- A material claim or other unexpected liability; or
- A significant change in senior management.

YOU ARE NOT ALLOWED:

to use "inside information" to trade in Securities if the information you know may generally effect the price or value of those Securities.

KEEPING ACCURATE RECORDS

To keep control of our business affairs it is important that we operate within the relevant legislation and accounting principles.

This means:

- We need to keep our books and records with accuracy;
- All of our financial transactions need to be recorded truthfully and supported by proper paperwork so they can be audited reliably and reported honestly;
- No employee should deliberately keep or help another employee to keep records that intentionally mislead or hide the true nature of a transaction;
- All funds and bank accounts need to be reflected in the Company books and no off-book transactions are allowed.

We are open and honest and will disclose relevant information to authorities when required

In your role you may be given access to assets that belong to the Company such as: cash; plant and equipment, including motor vehicles; stock and merchandise; Company confidential information; computers and software, including passwords.

- You should remember to always seek permission from a senior manager to take Company property from the workplace and ensure its removal is documented;
- Always use company property and business tools for their intended business use and not for personal use unless authorised;
- Never assume that damaged or expired stock is not wanted or valuable to the Company;
- Never disclose the Company's information to a third party;
- Never use the Company's information for your own purposes or for any purpose other than carrying out your duties;
- Safeguard the Company's information. Never send the Company's information to a personal email account, nor copy it onto a portable storage device
- For employees leaving the Company, return all Company property, including documents held in hard and soft copy.

If you believe that theft or damage is taking place in your workplace you should report it immediately to your manager. Theft or willfully damaging Company property is a criminal offence.

IT IS YOUR RESPONSIBILITY TO:

Protect and care for Company assets. We all need to ensure that our actions in relation to Company property are honest at all times.



SPEAK UP!

“DOING THE RIGHT THING” is demonstrated by acting with integrity, honesty and trust at all times. It is important when you see something that is not right, you report the matter

In the first instance, employees are expected to raise matters with their manager. Managers are expected to treat the concern with the utmost seriousness and address the matters raised.

If you are unable to escalate a serious issue through the normal processes, or you have strong reason to believe that a reported issue has not been investigated, you may access our Whistleblower service, Stopline. Examples of concerns that should be raised to are;

- Imminent risk to the health and safety of a person
- Suspected fraud
- Corruption
- Illegal activity

Employees should understand that the whistle-blower service is not designed for the purpose of resolving interpersonal disagreements.

CONTACT OUR WHISTLEBLOWER SERVICE, STOPLINE - 24/7

Telephone: 1300 30 45 50
Website: <https://ppgaust.stoplinereport.com>