



## Pine Valley Packaging Code of Conduct

Pine Valley Packaging Code of Conduct defines the rules of business conduct that must be applied to our day-to-day relations both internally and externally. The rules set out in this Code of Ethics are not exhaustive; combined with our employees' sense of responsibility, they establish the fundamental rules of business conduct and ethical guidelines applicable to all Pine Valley packaging employees. These rules in no way replace any laws or regulations in force in the various countries where Pine Valley Packaging does business.

### **Labor – Human Rights**

- Forced Labor – Will not use slave, forced prisoner, bonded, indentured, or any other form of forced or involuntary labor.
- Child Labor - Will not employ children under the minimum employment age.
- Working Hours - Will not exceed the weekly working hours as defined by local regulations.
- Wages and Benefits - Will pay workers the minimum wage as defined by the local regulations.
- Humane Treatment - Will respect the human rights of workers and there is to be no inhumane treatment such as harassment and abuse.
- Non-Discrimination / Non-Harassment – There is to be no discrimination in hiring and employment practices based on race, skin color, nationality, age, gender and sexual orientation, ethnicity, disability, pregnancy, religion, political opinion, labor union membership, marital status, or other factors that are irrelevant to business.
- Diversity, Equality, and Inclusion - We believe in an inclusive work environment where employees are welcomed, valued, respected, and heard. We believe that employees will be provided a safe work environment. We believe that diversity brings strength. We believe in equality of opportunity free from discrimination.
- Freedom of Association - Respect the rights of workers to associate freely, join or not join labor union, participate in protests and other such actions in accordance with local laws and regulations.
- Private or Public Security Forces - We will commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

- Land, forest and water rights and forced Eviction - We commit to the avoidance of forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.
- Conflict Minerals - Restrictions are a tool to protect human health and the environment from unacceptable risks posed by chemicals. Restrictions may limit or ban the manufacture, placing on the market or use of a substance. A restriction applies to any substance on its own, in a mixture or in an article, including those that do not require registration. It can also apply to imports. Examples of hazardous substances include but are not limited to: Tantalum, Tin, and Gold.

## **Occupational Health and Safety**

- Safe Workplace / Personal Protective Equipment – Understand the work environment and operations, and provide appropriate technical, administrative, and preventative measure if there are potential hazards and risks, in order to ensure the safety of workers. Also provide workers with personal protective equipment and the like, if necessary.
- Hazardous Substances – We will identify, assess, and mitigate worker potential for exposure to all Health and safety hazards including chemical or biological substances (WHIMIS).
- Accident Prevention and Emergency Preparedness – We will work to actively identify and assess potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. We will execute emergency drills at least annually or as required by local law. Emergency plans should include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans.
- Prevention of Occupational Injury and Illness – Understand the situation of occupational injury and illness and provide preventive measure. Also, provide medical examinations of workers in accordance with local regulations.
- Management of physically demanding work – Identify and manage physically demanding work, repetitive lifting, prolonged standing or any other motions that may pose health hazards including mental health, as not to cause occupational injury or illness.
- Machine and Equipment Safety Measures – Implement safety evaluation of machinery and equipment so as not to cause occupational injury or illness.
- Health and Safety Facilities – Provide workers with a healthy and safe working environment, facilities, water, toilets, etc..

## Environmental Conservation

- Responsible Stewardship / Renewable Energy / Reuse / Recycle - We will continually strive to protect the communities and environment that surround them. we will also continually strive to conserve natural resources including water, fossil fuels, minerals, soil, and virgin forest products by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means. Suppliers should promote circularity and closed loop systems by supporting the use of sustainable, renewable natural resources while reducing emissions, pollution, and waste. We also recognize noise emissions and will comply with local regulations.
- Compliance with Environmental Regulations – Obtain and maintain required environmental permits, approvals and reporting requirements in accordance with local regulations.
- Resource and Energy Saving – Endeavor to conserve resources and energy in all business operations.
- Waste Management – Prevent the discharge of hazardous wastewater into the environment.
- Air Emission Management / Greenhouse Gases – Endeavor to reduce harmful substances, greenhouse gas emissions, and o-zone depleting substances released into the atmosphere. We will comply with local regulations.
- Proper Disposal of Solid Waste – Endeavor for solid waste reduction and implement proper solid waste disposal.
- Management of Chemical Substances – Identify the harmful chemicals released into the environment, endeavor for usage reduction, replacement to less harmful substances, and leakage prevention.
- Management of Hazardous Substances – Identify hazardous substances contained in the products and ensure regulatory compliance is met.
- Biodiversity Conservation – Consider the impact and minimize the adverse effects on biodiversity in all business activities that include the use of natural resources.
- Animal Welfare - We will respect the welfare of animals and provide humane treatment in line with the five animal freedoms formalized by the World Organization for Animal Health (OIE) concerning animal welfare which include: freedom from hunger, thirst and malnutrition; freedom from fear and distress; freedom from physical and thermal discomfort; freedom from pain, injury and disease; and freedom to express normal patterns of behavior. No animal should be raised and killed for the single purpose of being used in packaging products. Pine Valley Packaging does not conduct or commission the use of animals in tests for research purposes or in the development of our packaging, either directly or indirectly.

## Ethics

- Prohibition of all forms of Corruption and Bribery or Conflicts of Interests – Prohibit any and all forms of corrupt practices including bribery, corruption, or extortion. This includes giving or receiving anything of value, including money, gifts, or unlawful incentives to improperly influence negotiations.
- Prohibition of Anti-competitive Behavior – Manage to ensure that there are no acts that inhibit fair competition.
- Information Disclosure – Appropriately disclose information regarding management and business activities, financial situation, and performance without falsification of any form.
- Provision of Appropriate Production Information – Provide accurate product and service information to customers and consumers.
- Fraud early Detection and Prevention – Adopt measures to protect whistleblowers to ensure that workers can report act of fraud without fear and retaliation.
- Protection of Intellectual Property – Respect and take due care of the intellectual property rights.
- Protection of Personal Information – Appropriately protect all business relevant personal information of your customers, suppliers, consumers, and workers.
- Counterfeit Parts – We will not utilize counterfeit components in any our products. We will also minimize the risks of introducing diverted parts and materials into deliverable products and adhere to relevant technical regulations in the product design process.
- Export Controls and Economic Sanctions – We will comply with all applicable restrictions on the export, re-export, release or other transfer of good, software, services, and technology; all applicable economic sanctions restrictions involving certain territories, entities and individuals, and all other similar trade related laws and regulations.

Steve Richards

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