

**PLASTA HOLDINGS GROUP**  
**CORRUPTION AND BRIBERY PREVENTION POLICY**

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**GENERAL PROVISIONS**

1. This Corruption and Bribery Prevention Policy ('the Policy') is the basic document of UAB "Plasta Holdings" ('the Company') and its subsidiaries ('the Group', 'the Companies of the Group'), by which the Group commits to create a corruption-resistant environment, to increase anti-corruption awareness, to not tolerate corruption and bribery in any form, and to take measures to prevent any manifestations of corruption and bribery. The Group aim to ensure that its performance and behavior meet the highest standards of reliability, integrity, transparency and business ethics accepted in society, and that emerging risks of corruption and bribery are assessed, managed and minimized.
2. The policy applies to all employees of the Group, members of the Board and other persons acting on behalf of the Group (hereinafter referred to as Employees), regardless of the form of their relationship with the Group's companies and their remuneration. The Group's business partners and other interested parties are encouraged to follow the provisions of the Policy.
3. The Policy was prepared in accordance with the Law on the Prevention of Corruption of the Republic of Lithuania, the recommendations of the Anti-Corruption Handbook for Business by the Special Investigation Service of the Republic of Lithuania, international standards on combating corruption and bribery, and regulations applicable in the countries where the Group operates, including the United Nations Convention against Corruption, the Civil Law Convention on Corruption of the Council of Europe, the Criminal Law Convention on Corruption of the Council of Europe, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.
4. This Policy is intended to supplement applicable laws, rules and regulations prohibiting corruption and bribery or

establishing liability for corruption and bribery in countries where the Group operates.

5. The definitions used in this Policy shall have the following meanings:
  - 5.1. **Close person** – Employee’s spouse, cohabitee, partner, parents (adoptive parents), children (adoptees), siblings (step brothers and step sisters), grandparents, grandchildren and their spouses, cohabitees, partners, as well as a legal entity where the Employee or the persons referred to above are members of the management or supervisory body or directly or indirectly control at least 50 % of the capital or votes at the meeting of the participants of the legal entity concerned, or with whom the Employee or any of the persons referred to above have a relationship based on the pursuit of common objectives or the pursuit of joint activities.
  - 5.2. **Gift** is any property, property right or service that is transferred or received free of charge. The concept of "gift" includes material goods and other types of gifts that can be valued in money, such as goods, services, various entertainment, discounts, gift vouchers, loans, invitations to participate in events, hospitality and catering, etc.
  - 5.3. **Group, Group of companies** – the Company and its directly and indirectly controlled legal entities.
  - 5.4. **Group Company** - Company of the Group of Companies, including the Company.
  - 5.5. **Conflict of interest** a situation when Employees have to choose between the performance of their duties and / or performance of delegated functions to the maximum benefit of Group companies and private Interest of their own or a Close person.
  - 5.6. **Bribery** is the promise or agreement of a person, directly or through an intermediary, to accept an illegal or unreasonable remuneration (material or immaterial, with or without economic value on the market), i.e. a bribe for the desired action or inaction, as well as the demand or provocation to give a bribe and the acceptance of a bribe.
  - 5.7. **Bribe** – any offering, giving, permission to give, request, acceptance or receipt, expressed in the form of any material or other personal benefit to himself / herself or another person (material or non-material, having economic value on the market or not having such value), for a desired lawful or unlawful act or omission of a person in the exercise of his / her powers.
  - 5.8. **Corruption** - an abuse of the power entrusted by PLASTA group in order to gain the personal benefit for himself / herself or another person. In general terms, it refers to dishonest activities where a person acts against the interests of the state or company and abuses his position to obtain or preserve a personal benefit or advantage for himself or any other person or company.
  - 5.9. **Nepotism** is the use of current positions to protect relatives or friends.
  - 5.10. **Donations/Support** - the voluntary and unremunerated provision of money, property or services by the Group to beneficiaries. Donations may be made by individuals, legal entities and companies, foreign states, individuals and legal entities of foreign countries, international organisations. In Lithuania, political parties and political organisations, state, municipal and budgetary institutions cannot provide support. Beneficiaries cannot be any company or individual, but only non-profit non-governmental organisations pursuing socially beneficial goals with their activities. The following activities are considered beneficial to society: international cooperation, protection of human rights, integration of minorities, promotion of cultural, religious and ethical values, education, scientific and professional development, non-formal and informal civic education, sport, social security and labour, health care, national security and defense, law and order, prevention of crime, adaptation of the living environment and development of housing, protection of copyright and related rights, protection of the environment and other socially useful and altruistic recognized activities.
6. Other terms used in the Policy shall be understood as defined in the Criminal Code of the Republic of Lithuania, the Law on the Prevention of Corruption of the Republic of Lithuania and other legal acts.

## APPLICABLE PRINCIPLES

7. Group is guided by the following principles to ensure the implementation of the Corruption and Bribery Prevention Policy:
  - 7.1. *Legitimacy principle.* The measures taken to prevent corruption must not conflict with existing legal acts.
  - 7.2. *Principle of personal example of managers.* The personal example of managers is a key factor in the formation of a culture of intolerance to corruption in the Group and the basis for the effective implementation of the Policy.
  - 7.3. *The principle of employee involvement.* Employees are involved in anti-corruption education programs within the Group and in the implementation of corruption prevention measures.
  - 7.4. *Proportionality principle.* The measures taken to prevent corruption must be proportionate to the level of corruption risks they are intended to manage.

- 7.5. *Principle of efficiency.* The cost of the measures taken to prevent corruption must not exceed their benefits.
- 7.6. *Principle of the inevitability of responsibility.* Any employee who has committed a corruption-related act, regardless of his or her position, functions and merits to the Group, shall respond in accordance with the procedure established by the law.

## **THE IMPLEMENTATION OF CORRUPTION AND BRIBERY PREVENTION POLICY**

8. The main subjects of Policy formation and implementation are the Company CEO, Managers of Group Companies, heads of structural units and persons appointed by the Company CEO orders to perform functions related to corruption prevention.
9. Company CEO:
  - 9.1. approves the Corruption and Bribery Prevention Policy;
  - 9.2. if necessary, conducts a review of the provisions and implementation of the Policy, and revises its provisions;
  - 9.3. approves the procedures detailing and supplementing the Policy and ensures their application;
  - 9.4. establish requirements for the conduct of persons employed by the Group and ensures their compliance;
  - 9.5. appoints persons responsible for the corruption prevention organization, the organization of anti-corruption education and the implementation of corruption prevention measures;
  - 9.6. ensure the integration of the Policy provisions into the Group Company's business processes;
  - 9.7. encourages anti-corruption culture in the Group company;
  - 9.8. by its example encourages other management staff to demonstrate leadership in the prevention of corruption.
10. Heads of structural units of each Group company:
  - 10.1. ensure the implementation of the Policy requirements in the unit under his/her control;
  - 10.2. encourage an anti-corruption culture in the unit;
  - 10.3. provide suggestions to the company's manager regarding the Policy and its implementation improvement.
11. Persons appointed to perform the functions related to the prevention of corruption and bribery of the Group's CEO:
  - 11.1. perform the functions of organizing prevention of corruption and bribery;
  - 11.2. to organize anti-corruption education.
12. All persons working for the Group and the members of the Board are personally responsible for the Corruption and Bribery Prevention Policy provisions knowledge and their compliance.

## **PROHIBITION OF CORRUPTION AND BRIBERY**

13. The Group operates on the **principle of zero tolerance for corruption**. The principle of zero tolerance of corruption is applied in relations with both the public and private sectors.
14. Group Employees are strictly forbidden to perform acts of corruption and bribery.
15. In particular, but without limitation, the employees of the Group are strictly prohibited from promising, offering, giving, or authorizing to promise, offer or give, soliciting or accepting bribes in the course of performance of their duties, including without limitations carrying out sales and procurement operations with customers, contractors, other business partners of the Company, and liaison with governmental bodies and public officials.
16. The prohibitions set forth herein apply irrespective of the form of the bribe (cash payments as bribes, kickbacks, service fees, agency remuneration, pecuniary gifts, the provision of services or other benefits, offering of employment to a relative of the person being bribed, grant of a contract or another business opportunity, etc.) and grantor or recipient of the bribe which could be without limitation a governmental or other public body or official, political party or another non-profit organization, institution or foundation, including their members, officers, and employees, public or private corporation, company, its directors, officers or private entrepreneur or individual.
17. Having noticed signs of Corruption in the Group or having received a request to offer or offer to accept a Bribe, the Employee must immediately inform his / her direct manager and the specialists of the Group Company responsible for

the implementation and supervision of the Policy.

18. The Group's business partners, suppliers and other third parties with relations with the Group must also be guided by the principles of ethical and responsible business conduct and comply with the anti-corruption provisions of the applicable legal acts.

### **GIVING AND ACCEPTING GIFTS**

19. Board members, Group company executives or employees can give and accept business gifts, representation gifts, invitations to receptions, cultural, sports or entertainment events, if their purpose is to maintain business relations, promote brand awareness and the Group's image.
20. Invitations to paid events and entertainment may only be accepted by the Employees if it is related with the business reasons or if the Employees contribute to the organization of such events (for example, participating as speakers), however, in this case, the Employee shall assess the effect of such gift in accordance with the questionnaire provided in the Annex No 2. Related costs of travel or accommodation shall be paid by the Group Company. However, the Employees should refuse invitations to catering facilities or entertainment that are too frequent to avoid complications or losing objectivity in the performance of the activities of the Group. If it is disrespectful to refuse an invitation, the Employee may accept it, agreeing that he / she will be allowed to respond the same or to pay by himself / herself / at the expense of the Group.
21. The Group does not tolerate any gifts, payments or hospitality that encourage or reward the decision or are intended to gain benevolence or exclusive appreciation in any activities related to the Group. In order to assess whether gifts and hospitality are accepted, the Employee must assess each offer in accordance with the questionnaire provided in the Annex No. 2.
22. The Employees are expected that before accepting any gifts or attending events they assess whether such actions are intended to have an unlawful impact, whether the issues in question and attendance at events will have a negative impact on the image or reputation of the Group. In case of doubt as to the value of the Gift or the purpose of its giving, the Employee should seek consultation from his / her direct manager or those responsible for the implementation and supervision of the Policy of the Group, who decide on the acceptance or return of the Gift.
23. Except in exceptional cases, where the CEO of the Group decides otherwise, any form of Gifts to officials of Lithuania or foreign states, employees of municipalities and their subordinate authorities, auditors and so forth, shall be prohibited in the Group in order to avoid any preconditions for doubts about the transparency and integrity of the activities of the Group.
24. The Employee cannot accept or give the Gifts if this may cause the Conflict of interest. This restriction does not apply to the Employees who have received Gifts in accordance with international protocol or traditions customarily associated with the Employee's duties, as well as with Gifts for representation (companies', organizations', institutions' and other symbolism, calendars, books and other informative prints), of a value not exceeding 100 euros. If the value of the specified Gift exceeds 100 euros, this Gift shall be considered as the property of the Group and its receipt shall be notified to the Group Company employee responsible for the implementation of the Policy, who shall indicate in each case to whom to transfer such Gift, or, if he/she received the Gift – to the CEO of the Group.
25. A member of the Board, a manager or employee of a Group Company may not give a gift or invitation in exchange for something or in the expectation of something in return, including by creating a sense of commitment on the part of the recipient.
26. Employees are required not to solicit Gifts directly or indirectly in connection with their duties in the Group from third persons. Gifts or corporate hospitality must be offered or accepted only if it is done in accordance with the legislation and Policy.
27. In any case, Employees are prohibited from accepting or giving Gifts in monetary terms, including gift coupons, gift vouchers, etc.
28. In order to improve image, reputation, openness of the Group and to contribute to social initiatives, Group's position may be represented through associations or other similar unifications whose purpose is to represent their interests, but in all cases without prejudice to the objectives of the activities of the Group, the requirements of existing legislation, avoiding incompatibility with the provisions of the Policy.

## **DONATIONS AND SPONSORING**

29. Donations shall be limited to specific objectives in the public interest, consistent with the mission, values and social responsibility policies of the Group, as well as in specific cases, support may be provided to mitigate the effects of humanitarian crises.
30. For the purposes of public benefit, activities are considered to be in the fields of international cooperation, protection of human rights, integration of minorities, culture, religious and ethical values, education, science and professional development, non-formal and civic education, sport, social protection and work, health care, national security and defense, law and order, crime prevention, adaptation of the living environment and housing development, protection of copyright and related rights, protection of the environment and other socially useful and altruistic recognized activities .
31. The Group shall refrain from any form of influence, whether directly or indirectly, and shall not finance or otherwise provide support to politicians, political parties/movements, their representatives or their candidates, election campaigns, foundations set up by politicians (or persons associated with them) or other organizations.
32. The decision on granting support/donations shall be taken by the CEO of the Group. Before taking such a decision, CEO should consult with the specialist responsible for the implementation and supervision of the Policy within the Group to ensure that the beneficiaries are not in any way connected with politicians, government representatives and other entities with decision-making powers regarding the interests of the Group.
33. Where the total amount of donations provided by the Company and its Subsidiaries exceeds 50 000 EUR (fifty thousand euros) in one year, the decision to provide donations can be taken only by the Board of the Group.
34. The Company may only provide support directly to legal entities with beneficiary status (Beneficiaries); no support is provided directly to individuals.
35. The support shall be subject to the conclusion of a grant agreement which shall specify, among other things, the purpose of the support, the obligation on the beneficiary to use the support as intended, and the responsibility of the parties.
36. The Group shall not provide donations to individuals, as well as legal entities, who have improperly implemented or infringed a contract for support previously concluded with the Group or with another support provider (and such a violation is known).
37. The support granted shall be made publicly available on the Group's website, and therefore no confidentiality agreements shall be concluded in the context of the support, which shall restrict the information to the public about the support provided by the Group and its use.
38. When providing support, the Group shall be governed by applicable laws, the Group Code of Ethics, this Policy, as well as other legal acts and internal documents of the Group Company.

## **NEPOTISM AND CRONYISM**

39. The Group does not tolerate any patronage of Employees' Close Persons, relatives (nepotism), friends and other related persons (cronyism), nor any direct relationship of subordination or control over such persons.
40. The selection of Employees shall be made in a non-discriminatory, transparent and fair manner, on the basis of their competencies and in accordance with applicable laws, regulations and the Group's internal documents.

## **CONFLICTS OF INTEREST**

41. Employees must avoid conflicts of interest and act in such a way that there is no doubt that such conflicts exist. Business transactions shall be conducted in the best interest of the Group.
42. The Employee is prohibited from participating in deliberations or adoption of decisions that cause or may cause a Conflict of interest. Prior to the commencement of the procedure for the preparation, consideration or adoption of such a decision or during the procedure itself, the Employee must inform his / her direct manager (in the case of managers of subsidiaries – the CEO of the Group) and persons involved in the procedure about the existing Conflict of interest, withdraw himself / herself and not participate in any way in the further preparation, deliberation or adoption of the decision.
43. Any participation in any legal form (including investment in such an entity or any financial interest from such an entity) in the activities of another entity competing with the Group must be notified in writing by the Employee to his direct manager and the responsible employee of the Group Company. Competing activity means a business involved in recycling of plastics, film product manufacturing or distribution, refurbishing or production of equipment for recycling or film production.

## **PURCHASE AND SALE OF ASSETS**

44. The Group shall carry out all procurement and sales procedures in the most equitable and transparent manner, in accordance with legislation, Procurement Policy and other internal documents. In cases where the activities and behavior of third parties providing goods or services to the Group are found to be in breach of the provisions of the Policy, the Group shall be entitled to take action, including termination of the contractual obligations.
45. The purchase of fixed assets and the sale of fixed assets owned by the Group are carried out in accordance with the CAPEX Policy and other internal documents-

## **POLICY IMPLEMENTATION, SUPERVISION AND CONTROL**

46. The managers of the Group Companies and their structural divisions are responsible for properly introducing the Policy to Employees or other responsible persons, and that their content is disclosed in a clear and understandable way (for example, organizing periodic training, training for new employees, etc.). Every manager has a duty to do day-to-day policymaking, communication to the Employees and formation of appropriate behavior.
47. In order to ensure the effective development of the anti-corruption environment and the timely implementation of the Policy, periodic training and consultation of the Employees are organized in the Group companies. The aim is to increase anti-corruption awareness among Employees, to encourage Employee involvement in anti-corruption activities.
48. The Group makes it possible to inform about violations of the Policy and to receive the necessary information related to its implementation by sending an email to the mailboxes created for this purpose and indicated in the Annex 1 to this Policy and the full details of the procedure for submitting and investigating notifications are set out in the Document of Whistleblower procedures.
49. In all cases, the anonymity of the reporting person, the security of the person and information is ensured, and measures are taken to protect the reporting persons from any adverse consequences - only the Group's appointed specialists responsible for the implementation and supervision of the Policy have access to the specified mailbox, ensuring full confidentiality, protection of the identity as provided for in the relevant legal acts, and undertake not to disclose the identity of the reporting persons to the Employees or other third parties. The protection of whistleblowers also applies where it appears that the information provided by the person has not been proved.
50. Group Employees and other stakeholders are encouraged to report through publicly available reporting channels of the Group possible corruption cases, public and private interest matching violations or other violations of the Policy.
51. All reports of potential breaches of the Policy must be properly investigated and handled by competent persons appointed by the management of the Group's Company as described in the Document of Whistleblower procedure.
52. Disciplinary action shall be taken immediately if any non-compliance with the provisions of the Policy is detected, including temporary suspension from ongoing duties or termination of employment or termination of contract with a third party.
53. When indications of a criminal offence are identified, the Group shall inform the competent law enforcement authorities.
54. Cases of policy violation shall be publicized through internal-Group communication channels ensuring the protection of personal data.

## **FINAL PROVISIONS**

55. The Corruption and Bribery Prevention Policy is approved and, if necessary, amended by the Company CEO (CEO of UAB "Plasta Holdings").
56. Company CEO together with the specialists responsible for the implementation and supervision of the Policy, collects summarized information on reports, inquiries and complaints received under this Policy during the previous calendar year and prepares a report to the Board of the Group on the implementation of the Policy.
57. Any person shall report on the possible need for a correction to the Policy, explaining the need and its circumstances, to those responsible for the implementation and supervision of the Policy who, after considering the notification received and considering that a correction would be recommended, shall make appropriate recommendations to the Company CEO.
58. All current and newly recruited staff of the Group and members of the Board must familiarize themselves with the Policy

and comply to its requirements.

59. Persons representing the interests of the Group or acting on behalf of the Group, not being employees of the Group or members of the Board, must also be familiarized with the Policy and adhere to its requirements.
60. The policy applies to the extent that it does not contravene the laws of the Republic of Lithuania and/or other applicable legislation.

### ANNEX 1.1 Basic information - Plasta AB responsible persons, contacts

Publication of the Policy, publicity	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Implementation of Policy requirements and control in the Company	CEO of the Plasta AB, Managers of the structural units of the company
Channels for reporting Policy violations	etika@plasta.it
Ensuring confidentiality of reports, administration of reports	HR Project Manager
Investigation of policy violations	CEO, HR Project Manager
Anti-corruption training to ensure Policy implementation:	HR Project Manager, Managers of the structural units of the company
<ul style="list-style-type: none"> <li>• Creation of the training program</li> <li>• Organization of training</li> <li>• Consultations for employees</li> </ul>	
Training of newly hired employees	Managers of the structural units of the company
Minimum Gift Value (Policy Item No.24)	100 euros
Person managing gifts when its value exceeds 100 euros	Chief Accountant
Donations/Sponsoring decision	CEO (excluding Policy clause No. 36)
Ensuring transparency and legitimacy of the beneficiary (Policy Item No 32)	Chief Accountant
Publicity of granted Donations/Support	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Transparency and publicity of job vacancies	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a> , under "Job offers", in the Personnel department
Approval of the sale of company-owned assets	CEO of the Group, Plasta AB CEO



## ANNEX 1.2 Basic information - Rullpack AB responsible persons, contacts

Publication of the Policy, publicity	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Implementation of Policy requirements and control in the Company	CEO of the Rullpack AB, Managers of the structural units of the company
Channels for reporting Policy violations	ethics@rullpack.se
Ensuring confidentiality of reports, administration of reports	CEO
Investigation of policy violations	CEO
Anti-corruption training to ensure Policy implementation:	CEO
<ul style="list-style-type: none"> <li>• Creation of the training program</li> <li>• Organization of training</li> <li>• Consultations for employees</li> </ul>	
Training of newly hired employees	Managers of the structural units of the company
Minimum Gift Value (Policy Item No.24)	100 euros
Person managing gifts when its value exceeds 100 euros	CFO
Donations/Sponsoring decision	CEO (excluding Policy clause No. 36)
Ensuring transparency and legitimacy of the beneficiary (Policy Item No 32)	CFO
Publicity of granted Donations/Support	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Transparency and publicity of job vacancies	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a> , under "Job offers"
Approval of the sale of company-owned assets	CEO of the Group, Rullpack AB CEO

### ANNEX 1.3 Basic information – Plasta GmbH responsible persons, contacts

Publication of the Policy, publicity	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Implementation of Policy requirements and control in the Company	CEO of the Plasta GmbH
Channels for reporting Policy violations	loretta.schnell@plastagmbh.de
Ensuring confidentiality of reports, administration of reports	CEO of the Plasta GmbH
Investigation of policy violations	CEO of the Plasta GmbH
Anti-corruption training to ensure Policy implementation:	CEO of the Plasta GmbH
<ul style="list-style-type: none"> <li>• Creation of the training program</li> <li>• Organization of training</li> <li>• Consultations for employees</li> </ul>	
Training of newly hired employees	CEO of the Plasta GmbH
Minimum Gift Value (Policy Item No.24)	100 euros
Person managing gifts when its value exceeds 100 euros	CEO of the Plasta GmbH
Donations/Sponsoring decision	CEO (excluding Policy clause No. 36)
Ensuring transparency and legitimacy of the beneficiary (Policy Item No 32)	CEO of the Plasta GmbH
Publicity of granted Donations/Support	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Transparency and publicity of job vacancies	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a> , under "Job offers"
Approval of the sale of company-owned assets	CEO of the Group, Plasta GmbH CEO

#### ANNEX 1.4 Basic information – Plasta Holdings UAB responsible persons, contacts

Publication of the Policy, publicity	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Implementation of Policy requirements and control in the Company	CEO
Channels for reporting Policy violations	maciejp@plasta.lt
Ensuring confidentiality of reports, administration of reports	CEO
Investigation of policy violations	CEO
Anti-corruption training to ensure Policy implementation:	CEO
<ul style="list-style-type: none"> <li>• Creation of the training program</li> <li>• Organization of training</li> <li>• Consultations for employees</li> </ul>	
Training of newly hired employees	CEO
Minimum Gift Value (Policy Item No.24)	100 euros
Person managing gifts when its value exceeds 100 euros	CFO
Donations/Sponsoring decision	CEO (excluding Policy clause No. 36)
Ensuring transparency and legitimacy of the beneficiary (Policy Item No 32)	CFO
Publicity of granted Donations/Support	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Transparency and publicity of job vacancies	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a> , under "Job offers"
Approval of the sale of company-owned assets	CEO

### ANNEX 1.5 Basic information – Gelpod UAB responsible persons, contacts

Publication of the Policy, publicity	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Implementation of Policy requirements and control in the Company	CEO
Channels for reporting Policy violations	etika@gelpod.eu
Ensuring confidentiality of reports, administration of reports	CEO
Investigation of policy violations	CEO
Anti-corruption training to ensure Policy implementation:	CEO
<ul style="list-style-type: none"> <li>• Creation of the training program</li> <li>• Organization of training</li> <li>• Consultations for employees</li> </ul>	
Training of newly hired employees	CEO
Minimum Gift Value (Policy Item No.24)	100 euros
Person managing gifts when its value exceeds 100 euros	CEO
Donations/Sponsoring decision	CEO (excluding Policy clause No. 36)
Ensuring transparency and legitimacy of the beneficiary (Policy Item No 32)	CEO
Publicity of granted Donations/Support	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Transparency and publicity of job vacancies	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a> , under "Job offers"
Approval of the sale of company-owned assets	CEO of the Group, CEO

**ANNEX 1.6 Basic information – Plasta Business Park AB responsible persons, contacts**

Publication of the Policy, publicity	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Implementation of Policy requirements and control in the Company	CEO
Channels for reporting Policy violations	linab@plasta.it
Ensuring confidentiality of reports, administration of reports	CEO
Investigation of policy violations	CEO
Anti-corruption training to ensure Policy implementation:	CEO
<ul style="list-style-type: none"> <li>• Creation of the training program</li> <li>• Organization of training</li> <li>• Consultations for employees</li> </ul>	
Training of newly hired employees	CEO
Minimum Gift Value (Policy Item No.24)	100 euros
Person managing gifts when its value exceeds 100 euros	CEO
Donations/Sponsoring decision	CEO (excluding Policy clause No. 36)
Ensuring transparency and legitimacy of the beneficiary (Policy Item No 32)	CEO
Publicity of granted Donations/Support	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a>
Transparency and publicity of job vacancies	Group website <a href="http://www.plastagroup.com">www.plastagroup.com</a> , under "Career"
Approval of the sale of company-owned assets	CEO of the Group, CEO

## ANNEX No 2 Questionnaire - Assessment of risks in case of gift

Before deciding whether or not to accept a gift, the following questions should be answered:

1. Why is a gift given and why is it given to me? Is there anything expected in return for accepting the gift?
2. Is the place, time or manner of the gift not such as to call into question the objectives of the gift?
3. Is the value of the gift not greater than the relationship with the giver would otherwise have led to?
4. Are gifts not received too often?
5. What is the intention of the person giving the gift (this is done out of courtesy or respect, or perhaps with the intention of influencing future decisions in a favorable way to himself, to pay, directly or indirectly, for what he does or has done)?
6. How does the gift relate to the activities carried out by the Company and am I a suitable representative of the Company to accept it?
7. Is the donor not treated in an ambiguous manner, by his conduct allowing him to form a false perception that a gift (reward) is expected and expected of him?
8. Does the acceptance of a gift not imply any potential obligations to the donor?
9. Will the fact of receiving a gift not cause any inconvenience or psychological discomfort if it is made public to everyone (colleagues, partners, media, the general public)?

### PRACTICAL QUESTIONS & ANSWERS

Q: Can I present money, vouchers or other similar items to my customer as an expression of gratitude for the business we conduct?

A: No, under no circumstance the Group allows giving money or similar gifts to business partners, regardless the value.

Q: Can I send a bottle of wine and some sweets to my business partner for Christmas?

A: No, it is not recommended to send any spirits and wine, according Group's policy alcohol must not be given as a gift.

Q: Can I accept an invitation to a cultural or sporting event from a new or potential business partner?

A: If the value of such invitation exceeds 100 EUR, you should decline. If it is below 100 EUR and you should answer the questions from Annex 2 to allow you to judge, what are the intentions of the person who is inviting you.

Q: I received a gift of value higher than 100 EUR from my supplier. What shall I do?

A: Please inform you direct manager and send the gift back to your supplier explaining that you cannot accept gifts of high value.

Q: I was invited to a dinner by my supplier, but the bill is very significant, exceeding 100 EUR per person. Can I allow the supplier to pay?

A: You should thank your host for organizing the dinner but you should pay your proportion of the bill not accepting it to be paid by your supplier.

Q: Can I invite a customer for a dinner where expected total cost per person will exceed 100 EUR?

A: You should always check approximate cost of meal and choose restaurants / bars where a bill is not likely to exceed 100 EUR per person.

Q: Can I go to my business partner's party/event/celebration where I do not know the value of such event?

A: Yes, you're always allowed to join more public or general events organized by your business partners (where there're no tickets or entry fees involved).

Q: My business partner has invited me to participate in a seminar or training course (not as a speaker but as an audience member), can I accept the invitation?

A: If it is a public event and the price of a ticket to the event is known (e.g. Login, EBIT, Tipping Point, etc.), the invitation could be accepted if the ticket price does not exceed 100 EUR. However, if the event is not public and the value of attendance cannot be identified, the invitation can be accepted.

Q: Can I congratulate my business partner on a personal occasion, e.g. birthday, birth of a child, wedding etc.?

A: Gifts, flowers up to a value of EUR 100 would be an appropriate gift.