

PLASTA AB SUSTAINABLE PROCUREMENT POLICY

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As a socially responsible company, Plasta AB puts the highest priority on transparency, fairness and justice in procurement. Secondary raw materials are the basis of our purchasing range. Therefore, sustainable - socially responsible and environmentally friendly - procurement of secondary raw materials (as well as other products and services) is also our core responsibility. It is a necessary condition for the Company's products to be produced responsibly, to ensure their quality, and to save resources and capital expenditure.

1. GENERAL PROVISIONS

- 1.1. The purpose of the **Sustainable Purchasing Policy** (the Policy) is to set out the unified key principles of strategic planning, coordination, contract fulfilment and control of procurement in Plasta AB (the Company, PLASTA), to be followed by all the Company's employees involved in the procurement process.
- 1.2. The Company's procurement practices are primarily based on the following sustainability principles: transparency, ethical behaviour, equality, promoting competition, increasing transparency of procurement processes and strengthening the Company's anti-corruption measures. The procurement function focuses on managing investments, developing long-term procurement strategies and working effectively with suppliers.
- 1.3. The Company's procurement process is also based on the rational use of the resources allocated to it, thereby contributing to the achievement of the company's strategic goals.

2. PRINCIPLES TO BE APPLIED

The Company shall be guided by the following principles in developing and ensuring the implementation of the Sustainable Procurement Policy:

- 2.1. **Reliability principle.** Only selected and verified suppliers who meet the established requirements (compliance with the Supplier Code of Conduct; preference is given to internationally recognised quality certifications, e.g. ISO, Eco-Vadis, etc.).
- 2.2. **Competitiveness principle.** Competitiveness shall be ensured in each category of procurement by using, where possible, at least two suppliers, whose proposals shall be compared with each other. Procurement shall encourage the search for and comparison of competitive bids and monitor and evaluate innovative solutions/products. Procurement shall not tolerate anti-competitive agreements (price fixing, market or customer sharing, limitation of production or sales volumes, etc.).

- 2.3. **The principle of long-term cooperation.** The Company values long-term business relationships and seeks to continuously improve by developing them.
- 2.4. **The principle of professionalism.** Every effort is made to ensure that procurement procedures and contracts are:
- legal;
 - ethical, socially responsible;
 - environmentally friendly;
 - timely and reactive to technological, commercial and structural changes;
 - based on cost-effectiveness indicators;
 - capable of identifying and managing risks that could threaten the supply chain.
- 2.5. **The value based principle.** Preference shall be given to suppliers and contractors who share the same values as the Company - procurement decisions shall be made taking into account the potential impact on the environment, society, respect for human rights, ethical behaviour, and safe working conditions.
- 2.6. **The principle of transparency, impartiality and zero tolerance of corruption.** The Company's employees shall conduct procurement in an impartial manner, i.e. in an objective, business-like and without prejudice, in accordance with the principles of equality, non-discrimination, proportionality and transparency for all suppliers. In conducting procurement, employees are also guided by the Company's Corruption and Bribery Prevention Policy, the Group's Code of Ethics and the Supplier Code of Ethics .
- 2.7. **Confidentiality principle.** The Company's employees involved in procurement procedures shall ensure the confidentiality of the information obtained during the procurement procedures.

3. PROCUREMENT TEAM

- 3.1. The main parties involved in the formulation and implementation of the Sustainable Procurement Policy are the Procurement Team, the ordering departments and the Heads of departments-budget holders.
- 3.2. The role of the procurement team in the organisation:
- 3.2.1. Conduct procurement activities in accordance with the Company's Sustainable Procurement Policy
 - 3.2.2. Ensuring that procurement are relevant and meet the needs of the departments;
 - 3.2.3. Participate in and coordinate procurement for the Company's development /renovation projects;
- 3.3. The structure, activities and responsibilities of the Procurement Team are set out in **Annex 1**.
- 3.4. The Procurement Team is headed by a Head of Procurement who annually reviews the responsibilities and activities of his/her team members and establishes/updates performance criteria (KPIs) for the team and each team member. KPIs are established to measure the achievement of the goals set.
- 3.5. Members of the Procurement Team responsible for the conduct of Procurement shall be provided with opportunities for further training to ensure that they are equipped to perform their functions properly and to safeguard the interests of the Company.

4. PROCUREMENT BY PRODUCT CATEGORY

The Procurement Team in the Company is responsible for the following categories of products purchased:

4.1. **Procurement based on direct production demand:**

- Plastic waste for recycling (Secondary raw materials -the purchase is carried out on the basis of the conditions approved in the Pollution Permit No TL-V,7-14/2014 issued by the Environmental Protection Agency to Plasta AB - the types of secondary raw materials that may be purchased and the quantities that may be purchased/stored);
 - Virgin materials (if needed);
 - Regranulate (if needed);
 - Packaging materials;
 - Concentrates and additives.
- 4.1.1. All procurement involving direct expenses is directly managed negotiated by the Procurement Team.
- 4.1.2. PLASTA works directly with manufacturers to avoid intermediary mark-ups. The main advantages are competitive pricing and direct supplier service and maintenance. The choice of intermediaries and distributors is determined by criteria such as favourable payment terms, price, delivery time, etc.

4.1.3. Price fluctuations for products are mainly determined by supply and demand in the market. The price is negotiable and is negotiated on the basis of demand, according to the observed fluctuations in the market (see Table No. 1 for details):

Table No. 1

Direct expenditure group	Criteria	Comments
<u>Secondary raw materials</u> (purchases are regulated by a Unified Product, Packaging and Waste Accounting Information system (GPAIS), which is controlled at national level).	Benchmarking of prices	Monthly price monitoring
	Negotiation frequency	Every month
	Sourcing strategy	The number of suppliers depends on the volume of the type of secondary raw material and PLASTA recycling capacity for secondary raw materials (SRM), with preference given to local suppliers. If their supply is not enough, supplies are organised from further regions. To ensure an uninterrupted supply of RDF according to production needs, stocks of 2-3 weeks are stored
	Minimum supplier criteria	Competitive price; properly prepared raw material and quality; deliverability in the case of a local small supplier (for quantities less than a full truckload)
<u>Packaging materials</u>	Price benchmarking	Benchmarking at least every 6 months - price monitored by EUWID - 10% increase or decrease corresponds to a 5% increase or decrease in purchase price
	Negotiation frequency	Bids/competitions once a year
	Sourcing strategy	At least 2 suppliers for each type of packaging.
	Minimum supplier criteria	Competitive pricing; quality compliance documents, certificates; delivery times up to 2 weeks
<u>Concentrates and additives</u>	Price benchmarking	Benchmarking is carried out at least every 6 months.
	Negotiation frequency	Quarterly for black/white and fillers. Once a year for colour.
	Sourcing strategy	At least 2 suppliers for each product type
	Minimum supplier criteria	Competitive price; ISO standards, TDS/MSDS

4.1.4. The standard delivery time should not exceed 30 days. The procurement team shall ensure an uninterrupted supply of products according to the Company's needs by creating the possibility to purchase alternative production materials.

4.1.5. The purpose of the Procurement team is to develop a Product Procurement Chain that meets the specific needs of our customers and ensures our internal manufacturing capacity. If necessary, the Purchasing Team organises monthly raw material procurement meetings to identify customer needs, the development of new materials, supplier capabilities and roles (delivery, quality, and price).

4.1.6. To ensure that purchases meet specific conditions, specifications and quality, the Purchasing Team shall work closely with the ordering unit (budget holders).

4.1.7. For each detailed group of direct costs, the Procurement team applies the following criteria:

- the frequency of price benchmarking/tendering;
- Preferred/minimum supplier criteria;
- where applicable, minimum order quantity;
- where applicable, the mandatory delivery time and storage;
- pricing.

4.1.8. Purchase of electricity - long-term supply contract. The main criteria are green energy and competitive e price.

4.1.9. Water procurement - a contract is concluded with the only possible supplier, Vilnius vandens UAB, which operates the water supply and sewage networks of Vilnius City; the shares are owned by Vilnius City Municipality.

4.2. **Procurement based on departmental needs/requests** are the purchase of products/services required for the repair/upgrading of equipment/buildings; for the internal needs of the Company:

- Repair materials;

- Spare parts, electrical goods;
- Work safety measures;
- Inventory, products for maintenance use;
- Fuels, oils, lubricants;
- Building materials;
- Tools.

4.2.1. The Procurement team organises procurement on the basis of monthly applications prepared by PLASTA units and approved by the Company's CEO. The type of application determines the procurement strategy:

- General fixed costs – repetitive purchases of same or similar services and materials/ goods for which supply contracts are signed;
- General additional costs - One-time purchase;
- Scheduled repairs are a One-time purchase;
- Project - one-time purchase;
- Failure/Breakdown - urgent purchase.

4.2.2. Product price fluctuations mainly depend on supply and demand in the market. The price is the subject of negotiations and is negotiated according to the need, according to the observed fluctuations in the market (see Table 2 for details):

Table No.2

Applications by type	Criteria	Comments
General fixed costs	Benchmarking of prices	Carried out once a year
	Negotiation frequency	Every 1 year
	Sourcing strategy	A minimum of two suppliers for each category to avoid interruptions in the supply chain
	Minimum supplier criteria	Competitive pricing; constant stocks of the products we need in suppliers warehouses
General additional costs; Scheduled/planned repairs; Project	Price benchmarking	2-5 alternative offers based on the technical parameters provided
	Negotiation frequency	Negotiation and agreement of contract terms before each purchase
	Sourcing strategy	Based on the needs of the departments, the contract includes specific delivery deadlines and penalties for delays
	Minimum supplier criteria	Compliance certificates and quality documents for the products to be purchased
Failure/Breakdown	Price benchmarking	At least 2 commercial proposals
	Negotiation frequency	Before each purchase. Priority is fast delivery.
	Sourcing strategy	Fast delivery is a priority. Where possible, a well-known supplier with products already in stock shall be selected..
	Minimum supplier criteria	Compliance certificates and quality documents for the products to be purchased

4.2.3. Procurement is organised in close cooperation with the ordering units (budget holders). The purchasing team is responsible for the contract and negotiation of price and delivery times; the internal departments are responsible for the technical parameters of the products and other technical conditions.

4.2.4. After the delivery of the product/service under the contract, the responsibility for controlling the terms of the contract passes to the ordering unit (product/service warranty period, etc.). They sign the acceptance -handover acts.

4.2.5. Supply contracts - tenders every 1 year; in the case of a one-time purchase, the procurement team will find a minimum of two alternative offers. The decision on what to buy is made by the ordering unit if there is a difference not only in price but also in terms of technical parameters, manufacturer's brand, etc.

4.3. Logistics.

4.3.1. Logistics are an important consideration when purchasing products. It is necessary to assess the prices of products in EXW and DAP terms. Choose the delivery method that is most cost-effective for the company. If the products are

purchased EXW, choose the logistics company by comparing at least two offers for the transport service.

- 4.3.2. When a service is purchased for the delivery of the Company's production to customers, the logistics company is selected by comparing at least two offers for the transport service.

Table No.3

Applications by type	Criteria	Comments
Logistics	Benchmarking of prices	Quarterly, more frequently - if needed
	Negotiation frequency	Negotiating the best price for each shipment
	Sourcing strategy	A minimum of two suppliers for each export/import destination to avoid interruptions in the supply chain
	Minimum supplier criteria	Competitive price; high customer service (pick-up/delivery according to agreed schedules, no delays)

4.4. Other procurement of products/services.

4.4.1. Company's vehicles - Procurement is organised by the Head of the maintenance department. The selection shall be made from a minimum of three suppliers. Purchases shall be approved by the CEO of the Company.

4.4.2. Security - procurement of the service shall be organised and the quality of the service shall be managed by the Head of the maintenance department. It is recommended that a tender for the purchase of the service be organised at least every 3 years and that a minimum of three potential suppliers be selected. The agreed price must be based on the number of staff required to perform the service and their day-rates of pay.

4.4.3. Scrap and waste transportation – procurement of services is conducted according to different types of waste:

- Waste generated after sorting of secondary raw materials - the Procurement Team carries out a quarterly selection of a service provider, selecting the waste manager based on the best price offer. The Procurement Team organises the delivery of such waste.
- Scrap metal, paper and wood waste, other waste generated - long-term contracts with waste handlers and delivery of waste organised by the Economic Management Unit.

4.4.4. Travel expenses - travel is in accordance with the General Manager's order. Procurement is organised by the Office Administrator. The best price option is considered in each case.

4.4.5. Other purchases - consultancy services, IT applications, insurance, etc. - are procured on a departmental basis depending on the value of the transaction and are subject to a competitive tendering process, selecting the supplier with the best price/quality ratio.

4.5. **Equipment, the development of the company's growth/renovation projects.** All procurement of equipment or project purchases shall be carried out in accordance with a pre-approved budget. The heads of the company's departments and technologists are responsible for selecting the equipment according to the technical parameters. For each purchase, at least two alternative offers are considered. The purchasing decision is based on price, delivery times and technical parameters. The final decision on the purchase is approved by the Director-General. The Procurement team advises and assists in any technical procurement negotiations and in the negotiation and signing of the contract.

5. CONTRACTING AND CONTROL OF PERFORMANCE

5.1. Contracts shall be signed on a mandatory basis with strategic and regular supply suppliers. One-off purchases of less than EUR 10,000 (ten thousand euros) - depending on the nature of the purchases - may be confirmed by an order sheet or by VAT invoices.

5.2. Whenever possible, the standardised Plasta AB contract templates shall be used, which can be found in S:\server-bendras\Sutartys. Variations of contracts are available:

- Product/service supply contract - a long-term cooperation agreement where the same products are bought on a regular basis;
- Purchase contract - used for one-off purchases of specific products;
- Contract for works - if products and their assembly/installation/start-up are purchased or only services/works;
- Contract (in English language) - used with foreign suppliers.

5.3. Any contract entered into must be approved and signed:

- The Procurement Team Leader is responsible for the commercial terms of the contract and confirms this by signing the contract;
- In the case of a contract based on the needs of a Company's units/departments, the head of this department is responsible for the specific/technical terms of the contract and shall sign it;
- If the contract provides for specific billing/financing, this is signed by the CFO;
- The CEO signs all contracts on behalf of the Company.
- The signing of contracts shall be carried out electronically, with electronic signatures as much as possible.

- 5.4. Contracts shall only be made with suppliers who are compliant with the values upheld by the Company.
- 5.5. Compliance with the Corruption and Bribery Prevention Policy, the Supplier Code of Ethics and the Code of Ethics shall be a general condition for the entering into contracts with suppliers.
- 5.6. Company employees and contractors are prohibited from having a personal interest in contracts.
- 5.7. Any potential or actual conflicts of interest should be reported immediately to the Company's CEO, Procurement Team Leader or CFO. There is always the possibility to use Whistleblowers Procedures to inform about breaches.
- 5.8. All supply contracts are administered by the staff in charge of the Procurement Team. Purchase contracts, contract agreements, once signed, shall be administered by the responsible personnel of the contracting department.
- 5.9. All signed contracts shall be stored in electronic format in the Accounting Department.

6. PAYMENT TERMS

- 6.1. For supply contracts, the target payment period is 60 days after delivery.
- 6.2. For purchase contracts, the target payment period is 45 days after delivery of the products.
- 6.3. If an advance payment is necessary, the agreement should be set at 20% of the transaction value.
- 6.4. If the agreement does not comply with the terms and conditions, it must be agreed with the company's CFO
- 6.5. The intention of the Procurement Team is to negotiate until the above agreed settlement dates have been reached.

7. SUPPLIERS - EVALUATION, SELECTION, RELATIONSHIP DEVELOPMENT

- 7.1. Communication with Suppliers via email, telephone or meetings.
- 7.2. All suppliers are categorised as strategic; regular supply; non-recurring purchases:
- 7.2.1. Strategic suppliers are the most important suppliers to the Company, with whom we have cooperation and partnerships. The list of strategic suppliers is updated once a year, selecting suppliers according to a set of criteria:
- Significant share of turnover in the category;
 - Long-term cooperation (3 years or more)
 - Level A as rated by suppliers;
 - Most favourable pricing for the Company.
- 7.2.2. Regular supplies are the second most important suppliers, from whom purchases are made once a month or more.
- 7.2.3. Suppliers of non-recurring purchases - purchases less than once a month. The importance of the supplier depends on the sum of the purchase.
- 7.3. All suppliers shall be informed of the Company's ESG Policy and asked to complete the Ethical Principles Questionnaire (**Appendix 3**).
- 7.4. Strategic and regular supply suppliers shall be evaluated once a year (the list of suppliers updated annually) by completing the Supplier Evaluation Questionnaire (**Annex 2**), a standardised questionnaire for each supplier individually, which shall be stored in the Supplier electronically created case file together with the signed Contracts.
- 7.4.1. The evaluation of the Supplier is carried out by the responsible employees of the procurement team together with units placing procurement orders.
- 7.4.2. The evaluation of the Supplier shall be based on the following aspects:
- Quality of goods/services provided;
 - Price level relative to competitors;
 - Payment terms;
 - Delivery terms;

- Timing of delivery;
- Service quality;
- Packaging;
- Reliability (consistent stocks, wide range, etc.);
- Shortest delivery time after ordering;
- Answers to the Ethical Principles Questionnaire and compliance with the company's Supplier Code of Ethics.

7.4.3. For each part of the evaluation, the supplier may receive between 1 and 5 points. The total maximum number of points is 55.

7.4.4. Suppliers are divided into three categories based on their scores:

- Category A (55-40 points) - best rating, preferred supplier, recommended for further cooperation;
- Category B (39-20 points) - the supplier should be monitored, be informed of critical areas and discuss an improvement plan to move closer to level A;
- Category C (19-15 points) - not recommended. The aim is to switch to another supplier if the quality of service does not immediately improve.

7.5. During negotiation or communication with Suppliers the Procurement team's task is to seek that Suppliers will meet the Category A criteria. To inform suppliers in the event of any non-compliance or failure and to monitor the improvement/correction processes.

7.6. A detailed evaluation of the Supplier is provided in Annex 2 - Supplier Evaluation Form.

8. PROCUREMENT MANAGEMENT

8.1. The organisation, coordination and management of procurement shall be based on the Company's Environmental, Social and Governance (ESG) Policy and Supplier Code of Ethics, which sets out the guidelines and principles for managing the Company's supplier relationships throughout the business cycle.

8.2. Suppliers shall be made aware of the Company's ESG Policy, Code of Ethics, Corruption and Bribery Prevention Policy, Supplier Code of Ethics and shall be asked to complete the Ethical Principles Questionnaire (Annex 3). The purpose of this questionnaire is to verify that the Supplier complies with the requirements set out in our Code of Ethics and other policies, as well as with the applicable legislation in the country Supplier performs.

8.3. Procurement management is specified in more detail in the procedure No. KP 10-2015 1K prepared according ISO 9001.

Annex 1: Structure, functions and responsibilities of the Procurement Team of PLASTA AB

Title of position	Number of positions	Functions and responsibilities
Head of Purchasing Department	1	Organises the department's operations; sets goals and tasks; monitors performance according to defined KPIs; negotiates with strategic suppliers and is responsible for the signing of procurement/supply contracts
Purchasing Manager	2	Manages procurement based on orders/needs; searching for new suppliers; negotiating supply/purchase terms; managing procurement-related documentation
Vehicle driver	1	Responsible for the delivery of purchased products from the supplier to the company and to the company's departments. Supervises the vehicles assigned to him/her and ensures that they are in good technical condition
Head of Raw Materials Procurement and Resale Department	1	Organises the department's operations; sets goals and tasks; monitors performance according to defined KPIs; negotiates with strategic suppliers and is responsible for the signing of procurement/supply contracts
Secondary Raw Materials Purchasing Manager	1	Manages procurement of raw materials on a purchase order basis; searches for new suppliers; negotiates supply/purchase terms; maintains procurement documentation; maintains raw material inventory balances
Warehouseman	2	Responsible for receiving/storage/dispatch of purchased products; managing related documentation; supervising the work of the loaders.
Forklift truck driver - auxiliary worker	4	Unloading and delivering purchased products to storage areas; dispensing products to company departments.

Annex 2: SUPPLIER EVALUATION FORM

Supplier _____

Products/services supplied _____

Eil. No.	Criteria	Species	Scores	
1.	Quality	There were no comments on quality	5	
		There were comments on quality	1	
2.	Price (including logistics costs)	Below market average	5	
		Market average	3	
		Above market average	1	
3.	Terms of payment after delivery	Payment in	<i>90 days and more</i>	5
			<i>60 days</i>	4
			<i>30 days</i>	3
			<i>less than 30 days</i>	2
		Payment in advance	1	
4.	Delivery conditions	Supplier's transport	5	
		Partly by supplier transport	4	
		Buyer's transport	3	
5.	Deadline for submission	On time	5	
		Up to 2 days late	4	
		Not in time	1	
6.	Quality of service	Good	5	
		Medium	4	
		Blog	3	
7.	Packaging	Quality	5	
		Medium	3	
		Low quality	1	

8.	Reliability (consistent stock, wide range, etc.)	Good	5
		Moderate	4
		Blog	3
9.	Shortest delivery time after ordering	Up to a week	5
		1 week	4
		Week 2	3
		Week 3	2
		More than 3 weeks	1
10.	Has the supplier completed the Ethical Principles Questionnaire?	Yes	5
		No	0
11.	If a supplier has completed the Ethical Principles Questionnaire, does it comply with our company's Supplier Code of Ethics?	Yes, fully compliant	5
		Yes, in partial compliance	3
		Not in compliance	1

Total evaluation score

Assigned supplier category

Category A (55-40 points); Category B (39-20 points); Category C (19-15 points)

Prepared by _____

(signature, title, name, date)

Annex 3. ETHICAL PRINCIPLES QUESTIONNAIRE

This questionnaire is designed to act as an outline for supplier compliance with the Code of Etchics, Supply Code of Ethics and other Policies also compliance with local laws.

Company:		Plasta Representative	
Factory Site		Job Title	
Form Completed By		Date:	

Section	ISSUE	YES	NO	Comments or Agreed Action
1.	EMPLOYEES:			
1.1.	Are policies relating to employment and conditions of employment freely available?			
1.2.	Is there any evidence of underage labour? (Under age = under the legal age for the specified country)			Minimum age employed = Legal minimum age =
1.3.	Is there any evidence of labour discrimination?			
1.4.	Are there fair and reasonable working hours, overtime and work breaks which are adhered to?			
1.5.	What are the shift patterns and average weekly hours of work?			
1.6.	Do wages, benefits and legal protection conform with and comply with local laws?			Statuary minimum wage = Actual minimum wage paid =
1.7.	Are adequate catering/cloakroom facilities available?			
1.8.	Are reliable grievance procedures in place for workers and their representatives?			
1.9.	In addition to salary, does the company provide extra benefits such as paid holiday, sick pay, etc. If so, give details			
1.10.	In addition to pay, does the company provide additional benefits such as education, food, etc?			
2.	MODERN DAY SLAVERY:			
2.1.	Is there a modern day slavery act policy in place? If yes please supply along with a statement, If no please advise why.			
2.2.	Have there been any violations related to modern slavery in the last 3 years? If yes, please indicate the number and nature of the violations.			
3.	HEALTH & SAFETY AT WORK:			
3.1.	Are buildings of a standard to comply with local laws?			
3.2.	Is a Health and Safety policy available?			
3.3.	Are accidents logged and appropriate action taken?			
3.4.	Is there a fire policy, including regular fire drills which are logged?			

Section	ISSUE	YES	NO	Comments or Agreed Action
3.5.	Are there adequate fire exits provided?			
3.6.	Is sanitation at work available to protect health?			
3.7.	Is potable water available on site?			
3.8.	Is protective equipment/clothing issued to staff?			
3.9.	Is such equipment worn?			
3.10.	Are guards fitted to dangerous equipment with the necessary safety notices displayed?			
3.11.	Is training given in the use of all equipment and reagents?			
4.	ENVIRONMENTAL ISSUES:			
4.1.	Are CO2 rates recorded, monitored, published and standards met? Are there plans to reduce CO2 emissions?			
5.	DISCLOSURE AND SUPPLIER SYSTEM:			
5.1.	Are all facts concerning production and production sites freely available?			
5.2.	Supplier representatives are aware of the standards and requirements applied by Plasta Group?			
5.3.	Does the supplier have its own monitoring/verification systems in place for raw material suppliers?			
5.4.	Is the monitoring system effective?			