



## Code of Ethics

Dear colleagues,

We are Miniplast: we manufacture and recycle plastic products for a sustainable future!

That is our ambition and our responsibility. Through our technologies, products, and innovation, we are working to make the best possible contribution to a viable future with enhanced quality of life for everyone.

We can only achieve this if we manage our business safely and responsibly and our customers and partners know they can trust us. That in turn depends on people doing the right thing, and making the right decisions, on a large and small scale, every day.

This Code of Ethics is binding for all of us and translates our ethical values into practical guidelines and advice on making responsible decisions. In difficult or unclear situations, listen to your inner voice and common sense. Also, speak up and ask your manager for advice.

Remember, your actions matter. You set the example in maintaining the highest professional business standards and leading others in doing the same. By living with integrity and embracing the principles of the Code, we each help create a company that is valued and trusted by our customers, our partners and society as a whole.

Thank you very much for your support!

Nadim Ghanem- Pares  
CEO of Miniplast Ltd.



# 1. Introduction

## ***Welcome to Our Commitment***

For over 30 years, Miniplast People have built an invaluable asset: Miniplast's reputation for operating with the highest ethical standards, honesty and fairness on the market. We, at Miniplast, respect our People, our Community and our Planet. This Code of Ethics is a testament to our unwavering commitment to conducting business responsibly, ethically, and in full compliance with our values and with local and international standards.

## ***Purpose of the Code***

The purpose of this Code of Ethics is to provide a comprehensive framework that guides our conduct in all aspects of our operations. It serves as a moral compass, informing our decisions and actions, ensuring that they are in line with our core values of integrity, transparency, and respect. This Code is designed not only to comply with legal requirements but also to foster a culture of ethical accountability and sustainable practices.

## ***Scope and Applicability***

This Code applies to all employees, management, and board members of Miniplast (hereinafter referred as "Miniplast People"), and to any third party who collaborates or works on behalf of Miniplast's interest (hereinafter referred as "Miniplast Stakeholders"). It extends to every aspect of our business operations, from our dealings with suppliers and customers to our interactions within the communities we serve. We expect every member of the Miniplast family to uphold these standards, ensuring that our collective actions contribute positively to our reputation and the wider society.

## ***Our Ethical Pillars***

At Miniplast, we anchor our ethical framework on three main pillars:

- **Respect for People**: Our operations are grounded in respect for human rights, equality, and fostering positive impacts in our communities. We establish responsible relations with all our stakeholders.
- **Environmental Protection**: We are committed to safeguarding our environment and ensuring sustainable use of resources, aligning with the highest international standards.
- **Excellence in Governance**: We uphold the highest standards of corporate governance, ensuring integrity, transparency, accountability, and fair business practices.



### ***Commitment to Continuous Improvement***

We recognize that ethical standards evolve, and so will our Code. We commit to regularly reviewing and updating this document to reflect the latest legal requirements, best practices, and societal expectations.

### ***Commitment to Promotion, Dissemination and Enforcement***

This Code of Ethics is made available to all stakeholders and may be retrieved on Miniplast website. The Code of Ethics is delivered to all Miniplast People upon hiring and will be disseminated when updates or changes occur. Compliance with the rules of the Code of Ethics is an essential part of our contractual obligations. For Miniplast People the violation of principles and contents of the Code of Ethics constitutes a breach of the primary obligations as an employee or a disciplinary offense. The violation will have all the legal consequences also in relation to the preservation of the employment relationship.



## 2. Core Ethical Principles

### *Foundations of Our Ethical Culture*

At the heart of Miniplast's mission is a set of core ethical principles that guide our actions and underpin our corporate culture. These principles are the bedrock upon which our reputation and operational integrity rest.

#### 1. Integrity and Honesty

- Upholding Truth and Transparency: We commit to conducting our business with honesty and integrity. This means being truthful in our communications, transparent in our operations, and accountable for our actions.
- Reliability and Trustworthiness: We strive to be a reliable partner to our stakeholders, earning their trust through consistent and honorable actions.

#### 2. Respect for Human Rights

- Commitment to Human Dignity: We adhere to the principles of Human Rights as outlined in the United Nations Declaration of Human Rights. Every business decision considers the impact on the people involved.
- Fair Treatment and Non-Discrimination: We are committed to creating an inclusive workplace where every individual is treated fairly, without discrimination based on gender, race, religion, or any other status.

#### 3. Environmental Stewardship

- Sustainable Practices: Recognizing our responsibility towards the environment, we engage in sustainable practices that minimize our ecological footprint and promote environmental well-being.
- Resource Conservation and Waste Reduction: We focus on resource efficiency and waste reduction, ensuring that our recycling processes contribute positively to environmental sustainability.

#### 4. Professional Excellence

- Commitment to Quality and Innovation: We are dedicated to maintaining the highest standards of professional excellence, continually seeking innovative solutions to enhance our operations and services.



- Continuous Improvement: We believe in the philosophy of continuous improvement, constantly seeking ways to better our processes, products, and services.

## **5. Accountability and Responsibility**

- Personal and Corporate Accountability: Each member of Miniplast is responsible for upholding these ethical principles. We hold ourselves accountable at all levels, from individual actions to corporate decisions.
- Responsiveness to Stakeholders: We are responsive to the needs and concerns of our stakeholders, ensuring that our actions align with our ethical commitments and their expectations.



### 3. Corporate Responsibility: Respecting People

At Miniplast, we recognize that our responsibilities extend beyond our immediate business operations. We are committed to being a responsible corporate citizen, positively impacting our employees, stakeholders, and the environment.

#### ***We respect People***

#### ***EMPLOYEES: Employee Welfare and Development***

- Health, Safety and Security: We provide a safe, healthy and secure work environment for all our employees, in line with international and Ghanaian labor laws.

*We all share the responsibility to make safety and health a daily priority.*

*We support each other in actions to live safely and in good health by utilizing available resources and observing recommended practices.*

*We take corrective action in a timely manner when we become aware of an unsafe or hazardous situation.*

*We are expected to work free from the influence of any substance that could affect judgment or safety on the job.*

*We do not tolerate acts of violence, including verbal or physical threats, intimidation, harassment and coercion.*

Contribution to SDGs:



- Ethical Work Environment: We guarantee a working environment free from any form of discrimination or abuse, in which we respect and support each other to fully develop our potential.

*We provide equal employment opportunities to all employees and applicants regardless of age, race, color, national origin, gender, sex characteristics, physical or mental disability, religion, marital or familial status, or any other factor protected by applicable law.*

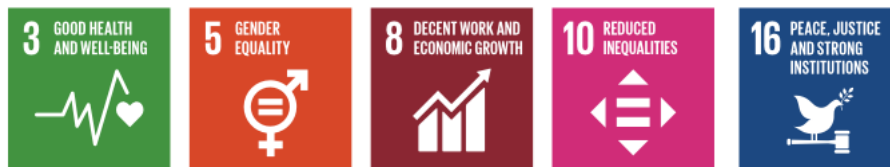


*We promote an environment of mutual respect by prohibiting discrimination and harassment (including sexual harassment) and unprofessional behavior.*

*We refuse all forms of forced and/or child labor.*

*We ensure respect of workers' rights and trade unions freedoms such as freedom of association and collective bargaining.*

Contribution to SDGs:



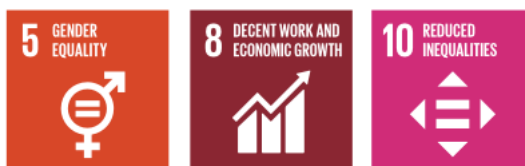
- Professional Growth and Development: We support the professional development of our employees, offering training and opportunities for growth and advancement.

Contribution to SDGs:



- Diversity, Cultural Pluralism and Inclusion:

Contribution to SDGs:



For further information, please refer to *Miniplast 2023 Annual Sustainability Report*.

## **STAKEHOLDERS**

### **Community Engagement and Social Responsibility**



We believe in the importance of establishing strong, lasting relationships and partnerships with the communities in which we operate in order to build shared value.

- **Community Development:** We are committed to contributing positively to the communities where we operate. This includes community development projects, educational initiatives, and local employment opportunities. We are currently established in Accra, Kumasi and Tamale but we have strong partnerships with communities in Burkina Faso, Togo, Nigeria, Niger, Benin and other West African countries.
- **Social Impact Initiatives:** We actively engage in initiatives that have a positive social impact, particularly in areas related to environmental sustainability and education. We develop educational programs on proper plastic collection and segregation such as the Green Schools Project in partnership with organizations such as Eco-Willow Ghana.
- **Contribution to the SDGs:**



For further information, please refer to *Miniplast 2023 Annual Sustainability Report*.

### **Ethical Supply Chain Management**

We share our values and integrity with suppliers, commercial and industrial partners in order to build relationships based on maximum transparency. We require our suppliers and partners to commit and share our principles, operating in line with our high standards of respect for Human Rights and environmental protection.

- **Responsible Sourcing:** We ensure that our supply chain practices are ethical, sustainable, and compliant with international standards.
- **Supplier Engagement:** We work closely with our suppliers to encourage and ensure adherence to ethical practices, fair labor, and environmental standards.
- **Entrepreneur Empowerment:** We support many of our suppliers helping them scale their businesses, by providing financial aid and knowledge transfer. We have empowered local entrepreneurs and micro-companies, contributing to the development of an ecosystem of small and medium companies in the plastic recycling industry.





- Contribution to SDGs:



For further information, please refer to *Miniplast Code of Conduct for Suppliers*.

### **Building transparent relationships with Customers**

We build commercial relationships focused on customer needs, allowing our customers to choose freely and consciously. We implement all commercial initiatives aiming to promote Miniplast and encouraging the purchase of its products and services, in compliance with regulations on consumer protection and customer satisfaction.

Our customers are our best brand ambassadors, and we proudly keep commercial relationships that have spanned during decades. Miniplast's first customer upon its foundation, in 1988, is still working with Miniplast in 2023 and it is one of its best customers.

Contribution to the SDGs:



### **Cooperation with Authorities, Institutions and Associations**

We promote and support active dialogue and cooperation with international, national and local authorities and institutions. We avoid declaring, persuading or encouraging false or not entirely true statements to authorities and institutions.

We are an active member of associations such as the Ghana National Plastic Action Plan (NPAP) and the Association of Ghana Industries. We collaborate with the University of Ghana and with local NGOs such as Environment 360 and Nasco Feeding Minds.

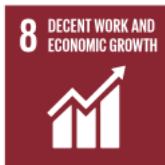
Contribution to the SDGs:



### **Creating Value for our shareholders**

We are committed to respecting and promoting the rights of our shareholders and protecting their investment by maximizing the value of our business. We adopt corporate governance best practices and ensure the utmost transparency and timeliness of shareholders dialogue in order to create conditions for informed decision-making.

Contribution to the SDGs:





## 4. Corporate Responsibility: Environmental Protection

### *We protect the Environment*

#### *Environmental Conservation and Sustainability*

Our commitment to environmental conservation is reflected in our drive for circularity in all our operations. We strive to make our plastic production eco-friendly and to significantly increase our recycling capacity and we advocate for a sustainable use of resources. We also collaborate with local and international partners to promote environmental conservation and awareness.

Contribution to the SDGs:



#### *Setting the Standard in Plastic Production and Recycling*

At Miniplast, we are not just participants in the plastic production and recycling industry; we strive to be leaders and innovators. Our commitment to industry-specific best practices is a testament to our dedication to excellence and sustainability.

##### *1. Advanced Production and Recycling Techniques*

**Innovative Production and Recycling Processes:** We employ innovative production and recycling processes to ensure maximum efficiency and minimal environmental impact.

**Continuous Technological Improvement:** We invest in research and development to continuously improve our production and recycling techniques, staying at the forefront of industry advancements.

Contribution to the SDGs:





## 2. Quality and Safety Standards

- High-Quality Products: Our commitment to quality ensures that the products we produce meet or exceed industry standards.
- Safety in Operations: We prioritize safety in all our operations, adhering to strict safety standards to protect our employees and the environment.

## 3. Environmental Impact Reduction

- Circular Economy: We enable a circular economy for plastic. We embed circularity in all our operations.
  - Closing the loop: By recycling plastic materials, we close the loop as recycled plastic is reintroduced in the global supply chain to be reused in products. Using recycled plastic also reduces the need for virgin plastic.
  - Reducing plastic pollution: By recycling plastic waste, we also contribute to reducing the amount of waste that is dumped in landfills or ultimately reaches the ocean.
  - Energy savings: The amount of energy required to produce recycled plastic (HDPE, PP and PET for instance) is on average around 20% of the energy required by virgin materials. By producing recycled plastic, Miniplast saves energy (electricity, fuel), water and GHG emissions.
- Waste Minimization: We focus on reducing all waste (not only plastic) in our operations, continually seeking ways to minimize our environmental footprint.
- Energy Efficiency: We implement energy-efficient practices to reduce our carbon footprint and contribute to a cleaner environment. Our Accra production plant partially runs on a 782 kW solar system, which accounts for nearly 20% of our total energy consumption.
- Contribution to the SDGs:





#### **4. Sustainable Supply Chain Practices**

- **Ethical Sourcing:** We source materials responsibly, ensuring that our supply chain practices align with ethical and sustainable standards. We are committed to reducing the use of virgin plastic and increase the use of recycled plastic in our products.
- **Supplier Collaboration for Sustainability:** We work collaboratively with our suppliers to promote sustainable practices throughout the supply chain. We expect all of our Suppliers to abide by the Miniplast Code of Conduct.

#### **5. Compliance with International Environmental Standards**

- **Adherence to Environmental Regulations:** We comply with all relevant international environmental standards and regulations, ensuring our practices are not only legally compliant but also environmentally responsible.
- **Environmental Certifications:** We seek relevant environmental certifications, demonstrating our commitment to sustainable practices. Miniplast is an ISO 9001:2015 certified company and the Environmental Permit from the Ghana Environment Protection Agency for its plastic operation.

#### **6. Community and Stakeholder Collaboration**

- **Community Involvement in Environmental Initiatives:** We engage with local communities in environmental projects and initiatives, fostering a collaborative approach to sustainability.

Miniplast Ltd is the first company in Ghana to sign the pledge for Operation Clean Sweep (OCS). This is an international project in collaboration with the Global Plastics Alliance, World Plastic Council, and the Plastic Federation Ghana. Miniplast Ltd is committing to zero pellet waste to prevent plastic entering the land and ocean environments by implementing enhanced prevention, containment, clean-up, and disposal systems.

- **Stakeholder Education and Awareness:** We educate our stakeholders about the importance of plastic recycling and environmental conservation, encouraging broader participation in sustainable practices. For three decades, Miniplast has been able to financially support women, youth, and men to go to specialized trainings in environmental sustainability and business management, as well as provide equipment loans to scale up informal and formal businesses. Year on year, Miniplast educates thousands of women and youth on proper waste segregation techniques, and business development skills.



## 5. Corporate Responsibility: Integrity

*We play fair and earn trust*

### **Compliance with Legal and Ethical Standards**

At Miniplast, our commitment to ethical conduct defines us. We pledge to uphold the highest international standards, ensuring our practices are not only legally compliant but also ethically sound.

### **Alignment with United Nations Conventions**

Our operations and business practices align with the principles outlined in various United Nations Conventions, including but not limited to:

- The United Nations Global Compact: We adhere to its ten Principles concerning human rights, labor, the environment, and anti-corruption.
- Sustainable Development Goals (SDGs): We actively contribute to achieving these goals, focusing on decent work and economic growth, industry, innovation and infrastructure, responsible consumption and production, climate action, and reduced inequalities.
- Conventions on Environmental Protection: We are committed to practices that protect and preserve the environment, in line with global environmental conventions.

### **Compliance with International Labor Standards**

Miniplast is dedicated to upholding international labor standards, ensuring fair and ethical treatment of all employees. This includes compliance with:

- International Labor Organization (ILO) Conventions: We abide by conventions related to working conditions, workers' rights, and occupational health and safety.
- Fair Labor Practices in accordance with Ghanaian laws and regulations: We maintain a workplace that is free from discrimination, harassment, and forced or child labor.

*We do not use any form of forced or involuntary labor (e.g., slave labor, human trafficking).*

*We comply with all applicable child labor laws and laws against human trafficking.*



## ***Ethical Business Conduct and Anti-Corruption***

We commit to conducting our business with the utmost integrity. This involves:

- **Preventing and managing Conflicts of interest:** Miniplast People, shall protect and promote the interests of the company by taking objective decisions and avoiding, wherever possible, any situation where conflicts of interest may arise, acting in compliance with the Code in all cases. A conflict of interests occurs in every situation where behaviors or decisions, in the context of working activity, are capable of creating an immediate or deferred advantage, even non-financial in nature that might arise for Miniplast People, or their family, or others with whom they have close personal or business relationships.
- **Anti-Corruption Practices:** In accordance with international anti-corruption laws and standards, we have zero tolerance for bribery, corruption, or unethical business practices.
- **Transparent Transactions:** All our business dealings are conducted transparently and ethically, fostering trust with our stakeholders. We ensure that all company documents, including financial statements, non-financial reporting, contracts and agreements, accurately provide a truthful representation of the facts.
- **Loyal and Fair Competition:** We believe in business freedom and free competition and we are inspired by principles of loyalty and fairness pursuing our success both by offering quality products and services at competitive conditions and by abiding by market principles when managing relationships with suppliers.

## ***Responsible Use of the Company's assets***

Miniplast People have an obligation to protect Miniplast resources and use them properly. Our resources are intended for business use. Examples of Company resources include, without limitation: Company proprietary information; Company intellectual property; Company funds, credit cards and other accounts; computers, office equipment; telephone and mobile communications devices; email; office supplies.

## ***Stakeholder Engagement and Responsiveness***

- **Open Communication:** We foster open and transparent communication with all our stakeholders, valuing their input and feedback.
- **Addressing Stakeholder Concerns:** We are committed to addressing the concerns of our stakeholders promptly and responsibly, ensuring their voices are heard and considered.



## 6. Compliance and Reporting

### *Ensuring Adherence to Our Ethical Standards*

At Miniplast, we believe that a strong ethical foundation is critical for our success and reputation. This section outlines our approach to ensuring compliance with our Code of Ethics and the procedures for reporting and addressing ethical concerns.

#### 1. Internal Compliance Mechanisms

- **Regular Audits and Reviews:** We conduct regular audits and reviews to ensure adherence to our ethical standards and compliance with relevant laws and regulations.
- **Ethics Training Programs:** All employees undergo regular ethics training to reinforce their understanding and commitment to our Code of Ethics.

#### 2. Reporting Ethical Concerns

- **Channels for Reporting:** We provide multiple channels, including an anonymous hotline and a dedicated email, for employees and stakeholders to report ethical concerns or violations.

If we think that someone is not applying, or is about to violate, one of the principles of the Code of Ethics, it is our duty to report it. Miniplast seriously examines all reports of suspected violations of the Code of Ethics or applicable laws and analyzes them promptly.

The channels for reporting potential violations of the Code of Ethics are shown in this box:

- Miniplast website: [www.miniplast.com](http://www.miniplast.com)
  - By mail to the address: 71 Spintex Road, Accra, Ghana
  - By email to the following address: [whistleblowing@miniplast.com](mailto:whistleblowing@miniplast.com)
  - By voicemail via the number: +233 302 948 472
  - In company offices, at the dedicated “yellow-box” mailbox placed at the HR department.
- **Non-Retaliation Policy:** We strictly enforce a non-retaliation policy to protect anyone who reports ethical concerns in good faith.





### **3. Investigation and Enforcement**

- **Prompt Investigation of Reports:** All reports of ethical violations are taken seriously and investigated promptly and thoroughly.
- **Appropriate Disciplinary Actions:** If a violation of our ethical standards is confirmed, we will take appropriate disciplinary actions, up to and including termination of employment.

### **4. Transparency in Reporting**

- **Open Communication:** We maintain transparency in our compliance efforts, providing regular updates to employees and stakeholders about our ethics and compliance activities.
- **Reporting Compliance:** We comply with international reporting requirements, ensuring that our stakeholders are informed about our compliance with legal and ethical standards.

### **5. Management Responsibility**

- **Leadership Accountability:** Our leadership is committed to modeling ethical behavior and ensuring that the entire organization adheres to our Code of Ethics.

### **6. Continuous Improvement**

**Feedback and Improvement:** We continuously seek feedback on our ethical practices and update our policies and procedures to address emerging challenges and best practices.



## 7. Implementation and Training

### *Bringing Our Ethical Standards to Life*

Our commitment to ethical excellence is not just in words but in action. This section outlines how we will implement our Code of Ethics and ensure that all members of the Miniplast team are equipped to uphold these standards.

#### 1. Dissemination of the Code

**Accessible to All Employees:** The Code of Ethics will be made available to all employees, in a format that is easily accessible and understandable.

**Integration into Corporate Culture:** The principles of the Code will be integrated into all aspects of our corporate culture, from daily operations to strategic decision-making.

#### 2. Comprehensive Training Programs

- **Regular Ethics Training:** All employees will undergo regular training sessions on the Code of Ethics, ensuring they understand and can apply these principles in their daily work.
- **Role-Specific Training:** Training will be tailored to different roles and departments, addressing the specific ethical challenges and scenarios they may face.

#### 3. Leadership Role in Implementation

- **Leading by Example:** Our leaders and managers will play a key role in implementing the Code, setting an example of ethical conduct for all employees to follow.
- **Support and Guidance:** Management will provide ongoing support and guidance to employees regarding ethical dilemmas and decisions.

#### 4. Monitoring and Evaluation

- **Tracking Training Completion:** We will track and monitor the completion of ethics training across the organization to ensure comprehensive coverage.
- **Evaluating Understanding and Application:** Regular assessments will be conducted to evaluate employees' understanding and application of the ethical principles outlined in the Code.



## **5. Feedback and Continuous Learning**

- Encouraging Open Dialogue: Employees will be encouraged to provide feedback on the Code and its implementation, fostering an environment of open dialogue and continuous learning.
- Adapting Training to Emerging Needs: We will continually adapt our training programs to reflect new ethical challenges, best practices, and feedback from our team.



## 8. Conclusion

### ***Reaffirming Our Ethical Commitment***

As we conclude our Code of Ethics, we wish to reaffirm our unwavering commitment to the highest standards of ethical conduct and corporate responsibility. This Code is not merely a set of guidelines; it is a reflection of our core values and the essence of our corporate identity.

### ***Commitment to Ethical Excellence***

- **A Living Document:** We recognize that this Code of Ethics is a living document, one that evolves as we grow and as the world changes around us. We are committed to regularly reviewing and updating this Code to reflect new challenges, best practices, and stakeholder expectations.
- **Foundation of Our Operations:** The principles laid out in this Code form the foundation of every decision we make and every action we undertake. They are integral to the way we conduct our business and interact with our employees, customers, communities, and the environment.

### ***Responsibility and Accountability***

- **Collective Responsibility:** Upholding the standards set forth in this Code is a collective responsibility. Every member of the Miniplast family, from the boardroom to the factory floor, plays a vital role in maintaining our ethical integrity.
- **Leadership Accountability:** Our leadership is particularly accountable for championing these principles, ensuring that they are embedded in all aspects of our operations and corporate culture.

### ***Moving Forward with Integrity***

- **Continuous Improvement:** We are dedicated to continuous improvement in our ethical conduct, seeking always to learn, adapt, and lead by example.
- **Engagement and Dialogue:** We encourage open dialogue and active engagement with all our stakeholders regarding our ethical practices. We believe that transparency and communication are key to building trust and reinforcing our commitment to ethical excellence.



## ***Final Words***

Our Pledge: We pledge to uphold these standards, not just because it is required, but because it is the right thing to do. We are proud of the steps we are taking to ensure Miniplast is a responsible, ethical, and sustainable company, now and in the future.



## Q&A regarding the practical implementation of the Code of Ethics

The Code of Ethics cannot provide specific recommendations for every possible situation. When we are uncertain or feel particularly pressured to make a decision, we learn to ask ourselves the right questions.

- Is what I am doing allowed?
- Am I observing the values and principles of Miniplast's Code of Ethics?
- Is my behavior in line with company procedures?
- Am I behaving correctly?
- Would I be comfortable if my actions were made public?

If the answer to even one of these questions is "No" or if we have a doubt about the legitimacy of our action or the application of a principle of the Code of Ethics, of a policy or of a behavioral standard, we must stop and ask for advice through the most appropriate channel. Expressing doubts and asking questions helps manage situations correctly and resolve potential problems.

If we have any questions or concerns, we may contact our direct manager or other company managers (such as the HR Manager).

Let's provide some examples of concerns and possible solutions:

- 1) *One of my female colleagues has become the subject of inappropriate comments, sexual jokes and offensive nicknames by some of my male colleagues. This is affecting the relations between the team members. What should I do?*

Miniplast is committed to creating a work environment that is respectful of differences and free from any type of discrimination. Sexual harassment is not tolerated in any case. Report the circumstance to the Human Resources function.

- 2) *I have witnessed the bullying of a foreign colleague by my manager. What should I do?*

Miniplast is committed to creating a work environment that is respectful of differences and free from any type of discrimination. All nationalities must be respected. Report the circumstance to your manager and, in any case, to the Human Resources function.

- 3) *I believe that I could further develop my professional skills in a different company department. What should I do?*

Miniplast is committed with the professional growth of its employees. Report your interest to your manager and to the Human Resources function to assess the feasibility of transferring from your current department to another.



- 4) *While visiting a supplier's plant I noticed some potentially critical elements in working conditions (poorly maintained environment, employees who work without the use of the appropriate personal protective equipment PPE). What should I do?*

Report the incident to the Procurement Department who will discuss the issue with the supplier. If the reported incident proves to be real, the company's expectations regarding the corrective actions to be taken will be clearly communicated to the supplier and the implementation of the actions will be verified.

- 5) *While testing the quality of a product batch I notice that the consistency of the material is not the standard quality level. We have shipped a whole truck of that product batch to one of our customers. What should I do?*

You should report it to your direct manager so that the information is provided to the customer. At Miniplast we commit to guaranteeing that the features of our products and services match the information provided to allow conscious choices by our customers and consumers.

- 6) *I am part of the Miniplast HR department, and we are selecting candidates for recruitment. My nephew participates in the selection. What should I do?*

Immediately report the conflict of interest to your manager and refrain from any decision-making processes while awaiting further instructions.

- 7) *During the assessment of potential supplier companies for Miniplast, I receive a crate of wine as a gift from one of the supplier companies. Can I accept the gift?*

No, you must refuse the gift. The contractor's conduct could be interpreted by an impartial observer as directed to influence your evaluation of the offers.

- 8) *To increase production, can I propose to my manager the postponement of a scheduled maintenance of an equipment based only on the fact that this does not present operating anomalies?*

No, before postponing a maintenance, it is always necessary to acquire every element useful to have a complete picture of the actual conditions of the equipment to prevent possible malfunctions.

- 9) *I have been invited to a meeting with competitors to discuss the submission of bids for a public tender. Competitors want to discuss about the pricing of the bids. What should I do?*



You should refrain from attending the meeting and immediately inform your manager.

*10) The company needs a permit from a local authority to put a new operation in place. The company filed its application to obtain the permit several months ago but has had no response from the authority yet. One local official suggests that he could speed up the permit award to the company in exchange for a cash payment. What should I do?*

You should immediately inform your direct manager about it so that Miniplast takes the appropriate measures to report this behaviour from the local official before the corresponding authorities.

**Approved by Chief Executive Officer**

**Nadim Ghanem-Pares**

**28 November 2023**