

ETHICS OF BUSINESS GLOBAL STANDARDS FOR SUPPLIERS

TC TRANSCONTINENTAL believes in doing business with suppliers, manufacturers, contractors, partners, agents, distributors and consultants (referred to in these guidelines as « Suppliers ») who respect high standards of ethical business behaviour.

The present Ethics of Business have been established to define the Company minimum requirements of its Suppliers.

Failure to observe these Ethics of Business will result in TC TRANSCONTINENTAL ceasing to do business with such Supplier.

Product Quality and Safety

As a major supplier of coated films and papers, TC TRANSCONTINENTAL has a fundamental responsibility to ensure that its products respect the highest standards in terms of safety and quality.

Suppliers undertake to provide services/products that meet or exceed all legal and all agreed upon quality and safety standards. Any threats to product safety must be immediately reported to TC TRANSCONTINENTAL.

Employment Practices

Treating employees with dignity and respect is a strong commitment of TC TRANSCONTINENTAL. We believe in doing business with Suppliers who share this commitment and we require Suppliers to comply with all applicable employment laws and to support fundamental human rights for all.

Health and safety

Suppliers will operate a safe and healthy work environment for their employees. Where applicable, this also applies to housing and eating facilities.

Child labour

Suppliers will not employ individuals in violation of the local mandatory school age, or under the legal employment age in each country where they operate. Moreover, in no case Suppliers will employ workers under the age of 15.

Compensation

Suppliers will, at minimum, comply with applicable wage and hours laws and regulations, including those relating to minimum wages.

Discrimination

Suppliers will not discriminate based on personal characteristics or beliefs and are expected to provide equal opportunities to all.

Forced labour

Suppliers will not use forced or involuntary labour, whether bonded or indentured. See Appendix 1 for Code of Conduct on Forced Labour

Freedom of association and collective bargaining

Suppliers will respect the right of employees to exercise their lawful rights of free association. Similarly, Suppliers will recognize the lawful rights of their employees to choose or not to choose collective bargaining representation.

Workplace harassment or abuse

Suppliers will not subject employees to physical, verbal, sexual, or psychological harassment, nor use corporal or physical punishment to discipline employees.

Working hours

Suppliers will comply with all applicable laws and regulations regarding working hours.

Environment

Protecting the quality of the environment around the world and developing sound environmental management practices is key for TC TRANSCONTINENTAL.

Suppliers are expected to comply with all applicable environmental laws and regulations. Any non-compliant practice must be promptly corrected.

TC TRANSCONTINENTAL will favour Suppliers actively seeking to reduce waste and minimize the environmental impact of their operations.

Conflicts of Interest

TC TRANSCONTINENTAL expects business decisions to be made in the best interest of the company. Any situation that creates or may create a conflict between personal and TC TRANSCONTINENTAL interests must be avoided. Suppliers are expected to disclose actual or potential conflicts of interest to TC TRANSCONTINENTAL.

Anti-corruption

TC TRANSCONTINENTAL strictly abide by all local laws and applicable European Union laws and requires Suppliers to act in a similar way.

Suppliers may not pay bribes or engage in corrupt practices in order to advance TC TRANSCONTINENTAL's business interests. This include, directly or indirectly, offering, promising to pay or authorizing the payment of money or anything of value to any third party for the purpose of influencing the acts or decisions of local officials.

Gifts, Favours and Entertainment

Gifts, favours and entertainment are not needed to do business with TC TRANSCONTINENTAL, and may lead, or appear to lead, to a conflict of interest.

No gift, favours or preferred treatment should be provided or accepted if it will obligate or appear to obligate the recipients

Gifts or entertainment may be provided if they are reasonable complements to business relationships, of modest value, and in any event not against the law of TC TRANSCONTINENTAL's present policy.

The following situations are strictly prohibited :

- TC TRANSCONTINENTAL employees requesting or soliciting personal gifts, favours,entertainment or services
- TC TRANSCONTINENTAL employees exploiting their position to solicit preferential treatment in pricing, terms or loans from TC TRANSCONTINENTAL's Suppliers.
- Bribes or kickbacks
- Cash or cash equivalents
- Lavish or excessive gifts and entertainments
- Entertainment at clubs or organisations that discriminate on the basis of race,colour, gender, national origin, religion, or sexual orientation
- Entertainment at sexually oriented establishments
- Entertainment that places the TC TRANSCONTINENTAL employee at a risk of physical harm.

Confidential Information

Suppliers will safeguard TC TRANSCONTINENTAL's confidential information by keeping it secure, limiting access to those who have a need to know in order to do their job, and avoiding discussion of confidential information in public areas (planes, trains, elevators, restaurants etc.), either directly or on mobile phones.

Confidential information includes facts, data and knowledge that are not generally disclosed such as trade secrets, financial figures, new products and marketing plans, research and development ideas, manufacturing processes, personnel information and information about potential investment, divestures and acquisitions.

The obligation to preserve TC TRANSCONTINENTAL's confidential information is ongoing, even after the business relationship ends.

TC TRANSCONTINENTAL will safeguard Suppliers' confidential information.

Fair Competition and Anti-trust

TC TRANSCONTINENTAL believes in free and open competition, and fully complies with the European Union competition laws. Suppliers are requested to comply with all applicable local and international regulations regarding fair competition and antitrust.

Accuracy of Business Records

Suppliers must record and report information accurately, honestly, on a timely manner and must not hide, fail to record or make false entries into financial books.

General Legal requirements

Suppliers will comply with all applicable laws and regulations to which they are subject.

Communication

Suppliers will take appropriate steps to ensure that these Standards are communicated to their employees and their own supply chain. Suppliers will use their best efforts to ensure their own suppliers adhere to these Standards as well.

Monitoring and Compliance

Suppliers will notify TC TRANSCONTINENTAL immediately if they become aware of any non-compliance of their company or of any of their suppliers with these Standards, and will take immediate actions that are necessary to remedy any non-compliance. TC TRANSCONTINENTAL reserves the right to engage in various monitoring activities to confirm compliance with these Standards.

To report any matters of concern:

TC TRANSCONTINENTAL

For the attention of the Legal Department

Email : ISO.Coatings@tc.tc

Appendix 1 – Forced Labour – Supplier Code of Conduct

TC Transcontinental Advanced Coatings (North Wales) Ltd opposes the use and exploitation of forced labour. We expect all those who work for us or on our behalf to share our zero-tolerance approach.

References in this Code to “forced labour” include slavery, servitude, and any type of forced or compulsory labour as well as trafficking for the purposes of exploitation.

Accordingly, our expectations of suppliers are as follows:

- 1) Suppliers must not use forced labour.
- 2) If requested by us, suppliers will complete a self-assessment questionnaire provided by us regarding the use of forced labour and the steps they have taken to ensure that neither they nor their supply chain make use of it. Suppliers will provide us with a copy of the completed questionnaire.
- 3) Suppliers will allow us to audit compliance with this Code by inspecting their facilities, reviewing records, policies and practices and interviewing personnel. Suppliers are expected to provide prompt access to their facilities, records, documentation, and personnel.
- 4) If we identify any non-compliance, suppliers must prepare, permit us to review and execute an improvement plan approved by us to rectify matters.
- 5) Suppliers will place similar expectations to those set out above on their own suppliers.

We may require compliance with this Code of Conduct in our contracts with suppliers and may also require that they impose equivalent obligations on their own suppliers.

Subject to any contractual terms, we may terminate our supply relationship if a supplier fails to comply with this Code of Conduct. If appropriate, we may report any breach of the Code of Conduct to the appropriate authorities.

If you have any concerns, or are aware of any suspected violations of this Code of Conduct, please notify the Human Resources Department immediately.

We acknowledge receipt of the TC Transcontinental policy on “Ethics of Business – Global standards for Suppliers” and Appendix 1 “Supplier Code of Conduct - Forced Labour”.

We acknowledge that we abide by the terms of these policies.

Company Name	
Name of person signing (print)	
Signature	
Job Title	
Date of Signature	

Please return a signed copy of these documents including the appendix to:-

TC Transcontinental Advanced Coatings Ltd
Ash Road North
Wrexham Industrial Estate
Wrexham
LL13 9UF
UK

Please retain a copy of the documents for your own files.