SAFRIPOL

shaping your world, responsibly

Safripol Business Code of Conduct

POWERED BY kap

Let's plastic responsibly

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Safripol Business Code of Conduct

The Safripol Business Code of Conduct should be read in conjunction with the KAP Limited Code of Ethics to ensure lawful and ethical business conduct.

1. Introduction

Safripol is committed to conducting business ethically and legally throughout the organisation. Safripol employees are expected to uphold the highest ethical and business standards. We expect suppliers and contractors with whom we do business to embrace similar values and standards.

At Safripol, we measure success not only by the results we achieve, but by how we achieve them. Every decision we make and every action we take must be driven by the highest sense of business and professional integrity.

The purpose of the Code is to inspire our employees to take integrity beyond words and ensure they translate it into action. As we interact daily in our business activities, our commitment to integrity requires not only compliance with relevant laws; it also requires that all of us - employees - act according to the Safripol values.

Employees are expected to be familiar with the Business Code of Conduct (the Code) and to apply it in the daily execution of their responsibilities at Safripol.

2. Safripol Values

The Safripol values are the foundation of the Code. Each value is an integral part of Safripol's standard of ethical practices and should influence every action we take. The Safripol values have been developed with full participation from our employees – even more reason to make it part of our daily lives at Safripol.

- **People**

We invest in our people and provide opportunities to enrich and improve their lives.

- **Customers**

We exist to enhance the sustainability of our customers.

- **Safety, Health and the Environment**

We intentionally operate safely and demonstrate care for the health of our employees, each other, our environment, and the quality of our service and products.

- **Integrity**

Integrity in our dealings with customers, suppliers, and our people is a core value, and we positively impact on the communities in which we operate.

- **Diversity**

Our diversity in culture, thinking and life view serves as a platform to continue building our success.

3. Making Ethical Decisions

Situations involving questions of ethics and values are often complex and ambiguous. The Code cannot address every workplace situation.

When faced with a decision, ask yourself these basic questions about the situation:

- What feels right or wrong about the action?
- Is your action or decision consistent with Safripol policy and guidelines, relevant legislation and the Code?
- How might your decision or course of action affect others – customers, suppliers, contractors, partners, competitors, the community, other employees, shareholders, and the Company?
- How might your decision or course of action appear to others? An innocent action could be perceived as wrongdoing.
- Have you fully explored the consequences of your decision or action?

If you have any questions or uncertainty related to ethical conduct and standards, you are required to consult your People Leader or Management Team member.

Management will apply *zero tolerance* in dealing with any violation of the Safripol Values and Code.

4. Conflict of Interest

An employee is not permitted directly or indirectly or via members of his family to operate or conduct any business or trade which may result in a conflict of interest between the employee and the Company's activities, unless prior written authorisation has been obtained by the Company for such activity. It is the responsibility of the employee at the date of commencement of employment, and on an annual basis thereafter to disclose to the Company any external interests.

The annual personal declaration process is initiated during November of each year and closes at the end of January. The process, inter alia, requires each employee to declare any affiliations to any registered businesses, industry associations and other registered associations e.g. Home Owners Associations and the like, irrespective of whether they currently engage in activities related to Safripol or not. It is requested that the disclosure is comprehensive so as to protect both the Company and its employees against potential conflicts of interest.

Failure to do so may result in the necessary disciplinary action being taken.

5. Gifts and Entertainment

Safripol selects products and services on the basis of price, quality and service (Total Cost of Ownership). We expect our customers to purchase our products and services on the same basis. All business transactions should be impartial, objective and free of undue influence.

Gifts and entertainment should never influence, or give the appearance of influencing, an employee's ability to make objective, impartial business decisions that are in the best interests of Safripol.

Modest gifts, favours and entertainment are often used to strengthen business relationships. However, no gift, favour or entertainment should be accepted or given if it obligates, or appears to obligate, the recipient, or if it might be perceived as an attempt to influence fair judgment. For this reason, no gifts may be received from or offered to customers, suppliers or other parties.

As alluded to above, entertainment is often used to strengthen business relationships. For this reason, entertainment, e.g. lunches, dinners, sports events, etc. can be offered or accepted with the express permission of a Safripol Executive.

For avoidance of doubt:

- no employee, or a member of their family is allowed to offer to, or accept or receive a gift from a Safripol customer, vendor or supplier.

- no entertainment will be approved if it:
  - Is not consistent with customary business practices
  - Is extravagant in value

- Can be construed as a kickback, bribe or payoff in violation of any law
- Could cause embarrassment to or discredit Safripol if disclosed.

When in doubt about a situation related to a gift or entertainment, you are required to consult addendum on page 11 of this document, your People Leader, or Management Team member or a Safripol Executive.

6. Anti-bribery

Company policy and anti-bribery laws around the world prohibit Safripol and its employees, or their representatives and agents, from giving or accepting money or other inappropriate enticements, directly or indirectly, to coerce or persuade the obtaining, retaining or rewarding of a business opportunity to Safripol or any person. Safripol expects all employees to comply with such policy and laws. Penalties for violating anti-bribery laws can be sever and often include heavy fines and prison sentences.

7. Computer System and Telecommunication Security Policy

Safripol relies on computer systems and telecommunications to meet our operational, financial and informational requirements.

It is essential that those systems be protected from misuse. The responsibility for such protection is shared by the application/data owner and Information Systems. All employees are required to be familiar with, and to comply with, the Safripol Corporate Computer and Telecommunications Security Policy. If you have questions, ask your people leader or Information Systems, or refer to the Safripol Information Technology Security Policy.

7.1 Use of Company Resources

Safripol's resources are intended for business use. Company resources include computers and telecommunications services as stated in the Safripol Corporate Computer and Telecommunications Security Policy. Employees may occasionally, and on a limited basis, use Company resources such as a copy machine, Internet access, telephone, or e- mail, for personal use. The conditions for personal use are that Safripol's Information Systems and other policies are followed, there are no measurable increased costs, and co-workers are not distracted by the use.

7.2 Information Systems and Data

Safripol's computers and all information on them, as well as any Safripol information on your home computer or any other device, are Company property. People use licensed software or documentation according to licensing agreements, do not duplicate this without express permission. Protect any passwords that provide access to Company networks. You are responsible for what you say in an e-mail message. Do not use your Safripol title or contact information for personal mail, e-mail, or anything other than Company business unless you have specific permission from your people leader. You must ensure that your use of Safripol information systems, networks and tools meet Safripol standards and policies, including Information Systems policies, security and data protection requirements.

7.3 Integrity in Brief

Company property is intended for business use. Information stored on Company equipment – including voice mail, e-mail, hard drives, servers and other devices – is subject to Company review at any time.

Q: I volunteer for an organisation that works with physically challenged children. May I use Company equipment to copy flyers for a fundraiser?

Non-Company projects are generally not acceptable. Your people leader should specifically approve each and any use of Company resources for non-Company purposes, since it involves use of Company property and costs the Company money.

Q: Is it okay to copy software from my office computer to my home computer so I can do Company work at home?

Do not copy software without first securing specific approval from Information Systems. In particular, Microsoft Office licences no longer allow copying of software licensed to Safripol for home use. The answer depends upon the terms and conditions of the software licence.

Q: May I use my office computer at work after business hours for schoolwork?

Check with your people leader first. Generally, this type of use is acceptable as long as there is no measurable increase in cost to the Company.

Q: Can I bring software from home and load it onto my computer at work?

No. You should not use any software product in violation of its licensing agreement, or that is not approved for Company use.

Q: I have a free electronic subscription to a recognised local newspaper, which I obtained some time ago. I occasionally access the site from my Safripol workstation. I find this to be a good way to receive local news and it's less expensive than receiving the paper in my office every day. Is this against Safripol policy?

The situation described is acceptable under Safripol's policies – while Company resources are primarily intended for business use, Safripol's guidelines do allow for some limited personal use.

It is not possible to cover every situation in policy statements. Good judgment should be the guiding principle along with consideration of the following factors:

- Safripol's computer systems and telecommunication networks are business tools. As with any other performance issue, personal use of business resources that detracts from job performance or increases costs to Safripol will be addressed by your people leader.
- These resources must not be used for non-Safripol business or other for-profit activities, or unauthorized organizations and activities.
- In general, you shouldn't do anything on Safripol's computer systems that would be inappropriate on paper or delivered through the mail.

If you have specific questions about the appropriate use of Safripol's computer or other resources, discuss them with your people leader. You may also contact Information Systems or HR office regarding ethics and compliance for further guidance.

7.4 Safeguarding Important Information

Safripol places the highest priority on the respect and protection of personal data, as well as all confidential data belonging to our Company.

Safripol's records, files, data and technical information are critical to our success. We must all work to ensure that Company information is appropriately protected at all times.

Avoid discussing confidential Company information, even with other employees, unless it is necessary for their job performance.

7.5 Data Privacy

Data privacy addresses the protection of personal data, which is any information that directly or indirectly identifies a person. Examples of personal data include personal, employment, medical, financial and education and training information. Most countries have laws regulating the collection and use of personal data, although the types of data covered, the nature of the protection, and local enforcement mechanisms vary. Safripol complies with all applicable laws. All employees are responsible for ensuring compliance with the data privacy requirements under the Company guidelines.

7.6 Confidential Information

Q: I know that some of the information I work with is 'Safripol Confidential'. Does that mean I can't talk about it with anyone, even other employees?

Safripol Confidential means that the information should be kept secure. Discuss such information only with those who need to know for Safripol business purposes. If you have doubts, ask your people leader to clarify the situation for you.

Q: If I find some confidential documents in a copier or in a conference room, what should I do?

Though it might be tempting, do not read the documents. If you cannot locate the owner, turn the documents over to your people leader. Do not leave the documents in the copier or in the conference room and do not throw them away.

Q: I need to disclose confidential information to a Safripol consultant or customer. What should I do?

Make sure that the information and the Company will be protected by a fully executed confidentiality agreement. Contact your Safripol buyer department or lawyer.

7.7 Records Management

Records and information are important assets of the Company. They are vital components of our decision making and operational processes and must be appropriately managed to obtain and preserve their full value. Every day you generate or are entrusted with these assets – assets required to conduct Safripol's business. Mismanaging or deliberately or inadvertently releasing these assets could provide others with a business advantage, cause harm to Safripol or Safripol's public image, or create unnecessary administrative costs.

All employees are required to be familiar with the Records Management Policy and schedules applicable to their work. The Company needs to maintain the credibility of the records management programme and to minimise the costs related to records. It cannot tolerate gaps or records held beyond the established retention periods.

Individual responsibility in day-to-day activities is key to effective information and records management. If you have questions, ask your people leader or your business or functional records management focal point.

8. Communicating with the Media

The public reputation of Safripol is a valuable asset, as it influences the decisions and behaviour of our business partners (customers, suppliers and shareholders), government organisations and potential employees, among others. It also affects how every employee feels about the company he or she works for. For these reasons it is everyone's responsibility to safeguard our reputation.

The media – comprising mainly the press, radio and television, and the Internet – are powerful shapers of perceptions and reputations. Representatives of the media owe Safripol no loyalty, they are more interested in bad news than good news, and they are experts at obtaining the information they seek. Communicating effectively and positively with the media, while avoiding the pitfalls, is a special skill. Any external communication needs to be referred to the KAP Executive Team.

If you are approached by the media, explain that you may not provide any information at all. Offer to take their details so that an authorised person can get back to them to answer their questions. Give these details immediately to your people leader, together with the topic into which the journalist is enquiring.

Remember that there is no such thing as "off the record" – anything you say to the media can be published, and there is always the risk that an innocent comment or response a rumor may be distorted to the detriment of Safripol.

It is not permitted for any employee who produces his or her own medium – for example, an Internet web log (blog) – to publish any information of any nature whatsoever relating to Safripol, its products, technology, strategy, business practices, business partners, finances or any other confidential matter, without written authorisation to do so and sign- off of every article that refers to Safripol.

These provisions relating to the media apply equally to information in all forms, including printed, written and verbal communications, information in electronic format, and photographs or video/film footage.

9. Safety, Health and Environment

- Protection of the Environment
- Workplace Health and Safety

9.1 Value Alignment

Protection of the environment, and the safety and health of our people, are core to our values and strategy. We strive for the highest standards and for continuous improvement in our Safripol processes. Through teamwork and ownership, we shall continue to build a working environment which is safe and a source of pride to our stakeholders.

Safripol is a signatory to Responsible Care and will be responsible in aligning our efforts with CAIA to ensure continued focus on the environment.

Safripol will be responsible in reporting requirements through legislation in all aspects concerned with safety, health and environment during the operations of our facilities.

9.2 Safripol Integrated Management System (IMS) Policy

At Safripol, protecting people and the environment throughout the life cycle of our products is integral to our actions and decisions. Each employee has a responsibility to ensure that our products and operations meet applicable government and industry standards.

Our goal is to eliminate injuries, prevent adverse environment and health impacts, reduce waste and emissions, and promote resource conservation at every stage of the life cycle of our products. We will report our progress and be responsive to the public.

9.3 Improving our Environmental Impact

We strive to significantly reduce our impact on the environment in which we operate.

We continue to measure loss of primary containment and emissions and will strive to eliminate all spillages and venting that could have a negative impact on the environment. We are aware of the declining natural energy resources and strive to continually improve the efficiency of our energy usage.

Safripol's safety, health and environment rules and policies are designed to provide a safe and healthy work environment that meets applicable requirements and laws. Maintaining this environment requires the participation of everyone.

We operate in an empowered organisation and believe that we will get the level of performance that we model and that we expect.

We expect you to:

- Be knowledgeable about and adhere to applicable safety rules, policies, standards and procedures, which include use of P.P.E.
- Individually accept and be held accountable for your own safety behaviour and performance.
- Have zero incidents within your control.

- Intervene when an unsafe act is observed.
- Report ALL incidents / injuries as soon as possible utilising the reporting process assigned to you.
- Actively participate in the site safety process including:
  - Company and personal safety goals
  - Hazard identification / correction
  - Pre-task Analysis – SWIFT (Stop, Wear, Intervene, Follow, Think)
  - Observation / intervention
  - Issues resolutions

We believe firmly that:

- Our good safety and environmental records are sustainable.
- Our interested parties will benefit from our commitment and understanding.
- We will achieve continuous improvement through our association with CAIA.
- We will be an example in meeting Responsible Care requirements.
- We will deliver beyond legislative and regulatory compliance.
- Through our empowerment culture we will work together.

10. Sustainability

- KAP is committed to the principle of sustainable development by striking an optimal balance between economic, environmental and social development and will strive to innovate and adopt best practice, working in consultation with its stakeholders. KAP expects its employees to take sustainability seriously including:
- minimising KAP's consumption of natural resources (including water) and waste generation;
- minimising the impact of KAP's operations on the environment including energy consumption, carbon dioxide (CO2) and other greenhouse gases (GHG);
- maximising KAP's recycling where possible;
- supporting Safripol separation at source initiatives; and
- minimising pollution and protecting the biodiversity.

11. Gathering Competitive Information

To obtain competitive information about products, services and prices, Safripol uses publicly available information including published articles, market analyses, and reports. Employees, officers or directors should not seek a competitor's confidential information, or accept anyone's confidential information, without the owner's consent. In no case will Safripol use illegal (involving theft, bribery, misrepresentation, or espionage) or unethical business means to obtain competitive information.

Competition

Q: A friend gave me some non-public information about a Safripol competitor. I didn't ask for it, but now that I have it, what should I do?

Do not study or make copies of the material. No matter where the information came from – a friend, co-worker, vendor, customer or other person – contact your people leader and forward the information to him/her. If you receive this type of information verbally, even from a customer, tell the person that the discussion violates Safripol policy and must stop immediately.

Q: A competitor has been making false and misleading statements in the marketplace about Safripol products and services. Should we respond?

Since it is against our Code to make false or misleading statements, we will not respond in kind. Continue to emphasize the positive aspects of our products and services and respond only with facts and references. Advise your people leader of the incident.

Q: At a professional association meeting a few members informally discussed a plan to divide their sales territories to reduce competition. I declined to join them, but what should I do if this happens again?

Such a conversation would probably be against competition laws. If this happens, immediately excuse yourself from the meeting and state emphatically and clearly that you cannot be part of such a discussion. Even if you believe your integrity has not been compromised by your presence at this discussion, report it to your people leader.

Q: I will be attending a trade association meeting next month. May I discuss an upcoming contract award with other bidders who will be there?

No. Do not discuss contract awards, prices, bids, terms of contracts, or similar proprietary business information with individuals from competing firms.

Addendum: Safripol Business Code of Conduct

Q & A on Gifts

Safripol's Gift Q&A forms part of the Safripol Business Code of Conduct which is displayed on the Safripol Intranet. Compliance with the Safripol Code of Conduct is not negotiable. It is therefore important that we all have a sound knowledge of the Policy to avoid any misunderstanding.

As a general clarification, gifts and or gifts-in-kind such as entertainment offered between suppliers and customers are not uncommon in the business world. As a matter of fact, it is often easier to accept and go with the flow than to report possible wrongdoing. However, when not controlled, one can find her or himself soon in an undesirable situation, when expectations due to the exchanged gifts, pushes oneself to uncomfortable conditions or behaviour. For as long as the gifts or gifts-in-kind are approved by your Executive, you will be able to demonstrate that the general conditions of business are competitive and not influenced by the gifts.

This guideline protects you by defining how you should best behave. As a general rule, above the table transaction, where all conditions are transparent, can hardly be faulted or criticized. When in doubt, report to your supervisor. Remember that reporting does not imply wrongdoing and that it is not implicit that further gifts should not be allowed.

1. What constitutes a gift?

A gift includes value in kind such as favours and entertainment. This obviously has a very broad connotation. It includes:

- Loans/advances/discounts from fellow employees, vendors, customers and suppliers.
- Favourable terms on products or services
- Gift certificates and / or prizes
- Transportation / use of vehicles
- Vacation / use of vacation facilities
- Sport events, i.e., invitations for rugby, cricket and other sport
- Spa treatments
- Golf days
- Fishing trips
- Any of the above received by a family member from a Safripol supplier or customer.

2. When must permission be sought to accept a gift?

No gift may be accepted or offered from a Supplier, Customer or Service Provider without the permission of an Executive of Safripol.
Gifts should also be declared via the Safripol Personal Declaration exercise which is conducted on an annual basis.

3. What should I do in instances where I am not sure if my behaviour would be in breach of the Gift Policy?

When in doubt, you should discuss with your people leader or a management team member.

4. Are there circumstances under which a gift definitely cannot be accepted even with permission?

No employee/director, or a member of their family, should offer, accept or receive a gift from a Safripol customer or supplier if it:

- Is in cash.
- Is not consistent with customary business practices.
- Is extravagant in value.
- It is going to place you in a compromising situation.
- Can be construed as a kickback, bribe or payoff in violation of any law.
- Could cause embarrassment to or discredit Safripol if disclosed.

5. What is the protocol if I would like to provide a gift to a customer or supplier or other parties?

Executive approval must be obtained before providing any gift or entertainment to customers, suppliers or other parties.

6. What are the consequences if I don't declare a gift or declare it falsely or not receive executive permission to accept the gift?

It will be viewed in a very serious light. Appropriate action will be taken which could result in dismissal.

New Hire Declaration:

I, _____, ID Number: _____, herewith confirm that I have received, read and understood the Safripol Business Code of Conduct and agree to abide by the terms as set out within.

Thus done and signed at _____on this _____day of _____20_.

_____
Signature