

# DETMOLD GROUP

As a leading manufacturer of paper and board products, the Detmold Group's global network includes Australia, Asia, Europe, the Middle East, South Africa, USA and Canada. A highly customer responsive company, the Detmold Group offers an unrivalled range of innovative packaging solutions to a diverse range of markets. Driven by the highest standards in every aspect of operations, the group places a strong emphasis on quality, service and efficiency within all aspects of its operations. The Detmold Group is proud to be an internationally respected supplier of quality packaging solutions.

## Code of Conduct Policy

### PURPOSE

In order to maintain and build on our success and the respect of our customers, the Detmold Packaging Group believes that all employees deserve to be treated with dignity and respect. In each and every aspect of the employment relationship we will treat our employees as they would themselves want to be treated. The Detmold Group is committed to a policy of complying with the law wherever it does business, and to maintaining high standards of business conduct. For these reasons, the Detmold Group has established the following policy. Compliance with this policy is required of all business units within the Group. Furthermore each business unit will ensure that their suppliers or subcontractors comply with this policy.

### SCOPE

This policy applies in all locations where the Detmold Group does business.

### POLICY

#### Compliance with Applicable Laws and Standards

All business activities of the Detmold Packaging Group must conform to all applicable national and local legal requirements, customs, and published industry standards pertaining to employment and manufacturing. If statutory requirements and published industry standards conflict, we will at a minimum, be in compliance with the one which, by law, takes precedence.

#### Employment Practices

**Prison or Forced Labor:** The use of prison or forced labor is absolutely forbidden. Likewise, the use of labor under any form of indentured servitude is prohibited, as is the use of physical punishment, confinement, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse as a method of discipline or control. The Detmold Packaging Group will not themselves utilize factories or production facilities that force work to be performed by unpaid or indentured laborers or those who must otherwise work against their will, nor shall they contract with Subcontractors that utilize such practices or facilities.

**Child Labor:** The use of child labor is strictly prohibited. The Detmold Packaging Group will not use workers under the legal age of employment in any country in which we operate. If the country does not define "child" for purposes of minimum age of employment, the minimum age of employment shall be 15 years of age, and the employment of any individual below that age shall be strictly prohibited. If local law allows the minimum age of employment to be 14 years of age or younger, the minimum age of employment shall be 14 years of age, and the employment of any individual below that age shall be strictly prohibited. In either situation, minors between the ages of 14 and 16 may only be employed to work and only be permitted to work during periods of time when they are not required by law to attend school (except as may be permitted under apprenticeship or other similar programs in which the minor is lawfully participating).



**Working Hours:** The Detmold Packaging Group will comply with all applicable national and local laws and with published industry standards pertaining to the number of hours and days worked. All employees are to be provided with reasonable daily and weekly work schedules and adequate allowance is to be made for time off. Except in extraordinary business circumstances, employees will not be required to work more than either (a) the limits on regular and overtime hours allowed by local law; or (b) 60 hours per week, inclusive of overtime. Adequate time off shall be at least one day off per week, except in extraordinary business circumstances. In the event of conflict between a statute and a published industry standard pertaining to this issue, compliance must be with the one taking precedence under national law.

**Compensation:** Our employees will be fairly compensated and provided with wages and benefits that comply with applicable national and local laws. This includes appropriate compensation for overtime work and other premium pay situations required by applicable national and local laws. If local laws do not provide for overtime pay, we will pay at least regular wages for overtime work.

**Non-Discrimination:** In all our business units we will conform to local and national law prohibiting discrimination in hiring and employment practices on the ground of race, color, religion, sex, age, physical ability, national origin, or any other applicable prohibited basis.

**Workplace Environment:** Our employees will be provided with safe and healthy working environments and, where provided, living conditions. At a minimum, potable drinking water, adequate, clean restrooms, adequate ventilation, fire exits and essential safety equipment, an emergency aid kit, access to emergency medical care, and appropriately-lit workstations must be provided. In addition, facilities shall be constructed and maintained in accordance with the standards set by applicable codes and ordinances.

## PROCEDURE

**Notification to Employees:** We will notify employees of the terms of this "Code of Conduct" in the local language and displayed in a prominent place accessible to all employees.

**Inspections:** The Human Resources Manager responsible for the relevant geographical zone or business unit will be responsible for conducting regular inspections and ongoing monitoring to ensure compliance with this Code of Conduct.

**Audit:** An audit will be conducted once per year to ensure that this policy is being enforced. The inspection will be done by the Group Quality Manager at each site. The report will be tabled at the next Board meeting following the audit.



Jenny Harvey  
Group Human Resources Manager  
Detmold Group



Alf Ianniello  
CEO  
Detmold Group

Date: 17<sup>th</sup> October, 2012