



## **CORPORATE SOCIAL RESPONSIBILITY**

The objective of the Company's overall policy with regard to corporate social responsibility matters is to provide a reference point to guide stakeholders, including all employees, on the elements that drive the conduct of Spectrum Plastics Group's business and relationships with the world in which we operate. Spectrum Plastic Group, as a member of the international business community, recognizes its corporate responsibility commitments and this is reflected in seven underlying policies, which relate to:

### **Standards of Business Conduct (Code of Ethics)**

We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards.

### **Health and Safety**

We are committed to a program of activities to achieve continuous improvement in health and safety performance. For further information see the Spectrum Plastics Group Health and Safety Policy.

### **Employees**

We are guided by our aim to deliver a competitive and fair employment environment and the opportunity to develop and advance subject to personal performance and business opportunity. For further information see the Spectrum Plastics Group Human Resources Policy.

### **Customers**

Our business and livelihood depend upon our customers. Every employee is responsible for ensuring that any contact with our customers and the public at large reflects professionalism, efficiency and honesty. We constantly strive to provide high quality service and products and good value for money.

### **Environment**

Our objective is to endeavour to reduce our impact on the environment through a commitment to continual improvement. For further information see the Spectrum Plastics Group Environmental Policy.

### **Suppliers**

We regard suppliers as our partners and work with them to help us achieve our policy aspirations in the delivery of our products and services. Specifically, Spectrum Plastics Group is committed to working with its suppliers of products and services to ensure that

the welfare of workers and labor conditions within our supply chain meet or exceed recognized standards.

### **Community**

We are committed to being a responsible corporate citizen through support for appropriate non-political and non-sectarian projects, organizations and charities.

We recognize that our business activities have varying direct and indirect impacts on the societies in which we operate. We endeavor to manage these in a responsible manner, believing that sound and appropriate performance in this area is linked to business success. We are committed to reviewing and continuously improving our social responsibility program and encourage our business partners to implement corporate social responsibilities appropriate to their businesses.

Our Business' throughout the world are committed to adherence to our policies. The stage and level of implementation varies according to business area and maturity of business.

### **Scope**

The Corporate Social Responsibility Policy applies throughout Spectrum Plastics Group, to all directors and employees and governs our approach to all our activities.

### **Responsibility**

The Chief Executive Officer is the main Board Director with primary responsibility. Monitoring of each of the underlying policy commitments is the responsibility of managers. The Vice President of Human Resources is responsible for coordinating operation of the policy and reporting on it to the Chief Executive Officer and the Board.

The Business Leaders have established appropriate responsibilities within their areas.

## **HEALTH AND SAFETY**

### **Spectrum Plastics Group Health and Safety Policy**

Spectrum Plastics Group is committed to a program of activities to achieve continuous improvement in health and safety performance. While compliance with legal obligations in the various jurisdictions in which we operate is our minimum commitment, we also seek to identify and share best practice across our businesses.

Each Business Area is responsible for identifying health and safety risks associated with its activities, and for developing, implementing and maintaining management systems and working practices leading to continual improvement in our safety performance. Business Leaders are responsible for establishing safety objectives and monitoring safety performance within their own Business Areas. This will include auditing with an associated program of risk improvements.

#### **Scope**

The policy statement applies to every business in the Company.

The Spectrum Plastics Group Health and Safety Committee comprises representatives for each of our Business Areas. The Committee is responsible for agreeing to objectives and standards worldwide and will report to the Board of Spectrum Plastics Group on progress and major incidents.

#### **Responsibilities**

Business Leaders are responsible to the Chief Executive Officer for health and safety within their Business Areas.

The Vice President of Human Resources is responsible for the Company's Health and Safety Policy and overall monitoring of health and safety issues, reporting to the Chief Executive and to the Board at least annually.

Business Leaders will ensure that the Vice President of Human Resources is made aware of significant local health and safety issues at an appropriate level of materiality.

## **HUMAN RESOURCES**

### **Spectrum Plastics Group Human Resources Policy**

We are guided by our aim to deliver a competitive and fair employment environment and the opportunity to develop and advance subject to personal performance and business opportunity. To this end all Spectrum Plastics Group companies will have developed and implemented local policies and procedures in line with local legislative requirements and the following standards:

#### **Equal Employment Opportunity**

Spectrum Plastics Group supports the principle of equal employment opportunity and is opposed to all forms of unlawful discrimination on the grounds of actual or perceived sex, race, nationality, ethnic or national origin, genetic information, religion, marital status, sexual orientation, disability or age. Spectrum Plastics Group companies will conduct their businesses in a way that seeks to ensure individuals are treated equally and fairly and that all employment, training and career development decisions are made on job based criteria. All personnel are expected to comply with this policy and the discrimination, harassment or victimization of others will not be tolerated. A breach of this policy will lead to disciplinary action, which could include dismissal.

#### **Recruitment and Development**

Spectrum Plastics Group aims to appoint the best person for the job. All appointments should be based on individual performance and job-based criteria. It is the Company's policy to encourage employees to develop and manage their own careers. It facilitates this by providing appropriate job training, and where appropriate, aiming to fill vacancies with existing staff where employees are suitably qualified and experienced.

#### **Remuneration**

Spectrum Plastics Group aims to attract, motivate and retain high caliber staff by rewarding them with competitive salary and benefit packages which are linked both to individual and business performance as well as the external employment market.

#### **Communication**

Spectrum Plastics Group policy is to communicate with employees to ensure understanding of the businesses and the impact business decisions have on employees and to obtain feedback and ideas of employees to improve the operation of the business.

#### **Redundancy**

Spectrum Plastics Group's approach to managing Company restructuring is characterized by detailed planning, involvement of those affected as appropriate and, where job losses are unavoidable, seeking alternative opportunities to minimize the personal impact. Individual companies operate their own redundancy policies to ensure that they comply with all local legal requirements.

**Scope**

The policy statement applies to every business in the Company.

**Responsibilities**

The Chief Executive Officer is the sponsor of the Company's Human Resources Policy. The Vice President of Human Resources reports to him on specific HR issues and monitors the implementation of the policies. Each Business Area is responsible for the development of local policies and procedures in order to ensure that the objectives of this policy are fulfilled.

## **ENVIRONMENT**

### **Spectrum Plastics Group Environmental Policy**

Our objective is to endeavor to reduce our impact on the environment through a commitment to continual improvement.

Spectrum Plastics Group is committed to compliance with environmental legislation and regulations in the jurisdictions where our companies operate.

Each Business Area is responsible for identifying any adverse environmental impact associated with its activities, products and services and to control them by developing, implementing and maintaining management systems which are consistent with this policy and which reflect the environmental circumstances of their businesses including the needs of their customers. Where appropriate our business areas will implement management systems which are compatible with applicable ISO standards and include targets, monitoring of performance and auditing.

In doing this we will seek to ensure, through the efficient use of resources, a reduction in any negative environmental impacts whilst also positively influencing business performance.

#### **Scope**

The policy statement applies to every Business Area in the Company.

#### **Responsibilities**

The Chief Executive Officer is the sponsor of the Company's environmental program. The Chief Technical Officer reports to him on the environmental program.

Each Business Area is responsible for the development of a local program in order to ensure that it fulfils the objectives of this policy.

## **SUPPLIERS**

### **Spectrum Plastics Group Ethical Trading Policy**

Spectrum Plastics Group regards suppliers as partners and works with them to help us achieve our policy aspirations in the delivery of our products and services. Specifically, Spectrum Plastics Group is committed to working with its suppliers of products and services to ensure that the welfare of workers and labor conditions within our supply chain meet or exceed recognized standards.

Each Business Area is responsible for ensuring that all those affected by their supply chain are producing goods and services which adequately meet internationally recognized minimum requirements for worker welfare and conditions of employment. The minimum requirements are those defined by the International Fair Labor Organization (IFLO) or based on the Ethical Trading Initiative dependent on the business jurisdiction.

Each Business Area is responsible for implementing appropriate processes to assess supplier's compliance with the standards and monitor performance and improvements against the standards. Suppliers who are unable to meet all the requirements after an initial assessment/audit will be given the opportunity to fully comply within a period which is deemed appropriate for the circumstances. An action plan should be documented and the supplier expected to commit to addressing all the areas where discrepancies have been identified. The process of improvement via this method is principally down to the commitment of the supplier's management team/owner/agent to ensure that all areas are addressed. If Spectrum Plastics Group has reason to believe that the supplier is not making sufficient or committed progress, then this could lead to a closure of the relationship until such time that Spectrum Plastics Group is confident that all areas have been satisfactorily addressed.

Spectrum Plastics Group companies reserve the right to cease a relationship with a supplier if it is subsequently found that unacceptable practices are being employed within any manufacturing sites used for Spectrum Plastics Group products. These include use of child labor forced or bonded labor as well as physical abuse or discipline and extreme forms of intimidation.

#### **Scope**

The policy applies to every business in the Company.

#### **Responsibilities**

Overall Company ethical trading issues are the responsibility of the Chief Executive Officer supported by the Business Leaders who are responsible for implementing and monitoring ethical trading policies within their Business Areas.

## **COMMUNITY**

### **Spectrum Plastics Group Community Investment Policy**

Spectrum Plastics Group is committed to being a responsible corporate citizen through support for appropriate non-political and non-sectarian projects, organizations and charities.

At the Company level a cross section of projects within registered charities are sponsored predominantly in the fields of healthcare, education, disability, children and the arts.

Each Business Area is encouraged to develop their own local charitable giving programs in line with the Company guidelines but taking into account local company requirements including marketing initiatives and budgetary considerations.

All employees are encouraged to act as responsible and responsive citizens of their communities and to support projects, organizations and services that work towards the common good and improvement of their community and society.

#### **Scope**

The policy statement applies to every business in the Company.

#### **Responsibilities**

The Chief Executive Officer and Vice President of Human Resources oversee corporate sponsorship and charitable giving.

Business Areas are responsible for selecting appropriate local charities to support.



**ACKNOWLEDGEMENT**

**Corporate Social Responsibility and Standard of Conduct**

This will acknowledge that I have received and read the SPG Corporate Social Responsibility and Standard of Conduct Policy.

I understand that I am subject to demotion or dismissal for any future conduct on my part which I know, or reasonably should have known, constitutes a violation of either the express terms or the spirit and intent of these standards.

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Signature

\_\_\_\_\_  
Typed or Printed Name

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Location

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Date