

# Thriving Enterprises Pty Ltd Code of Ethics 2020

## PRINCIPLES

- Conduct all aspects of the business in a professional and responsible manner in keeping with the spirit of this Code.
- Sustain a level of competence expected of Thriving as a professional operator and only manufacture or supply packaging for which Thriving is suitably qualified.
- Deal with all business partners and the public with honesty and fairness.
- Ensure all advertising and promotions are not false or misleading, and do not harm the professional reputation and service of the customer or the Packaging Industry as a whole.
- Manufacture and supply products and services of the highest quality and optimum value while maintaining the ability to earn a reasonable profit.
- Wherever possible use and recommend packaging structures which is manufactured with regard to its effect on the environment.
- Provide a safe and satisfying work environment for all employees.
- Engage in fair and open competition based on truthful representation of products and services offered.
- Not intentionally injure the professional reputation or practice of our principle suppliers or customers.

## BUSINESS ETHICS AND INTEGRITY

**Legal compliance** - Thriving complies with the applicable laws, standards and other legal provisions of Australian states in which it operates. We are aware of the continuous development of International Regulations and social standards and adopt those that are relevant to our business.

**Competition** - Thriving is committed to fair competition. Laws protecting competition, especially anti-trust laws and other regulations that regulate competition, shall be observed. Companies and employees must never engage in any anti-competitive activity such as illegal fixing of prices or the sharing of markets.

**Anti-corruption and bribery** - Thriving is committed to work against corruption in all its forms. No such illegal activity is tolerated either in action or as negligence by any of our employees or suppliers. We use suitable means to promote transparency, trading with integrity, responsible leadership and company accountability. The company shall comply with the applicable criminal law on corruption.

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**Gifts and entertainment** - Thriving employees or anyone acting on our behalf may solicit, give or receive, directly or indirectly, gifts, gratuities, special allowances or a benefits. However, Thriving also recognises and accepts that occasional modest – and in the context of business – reasonable, gifts or hospitality can make a valuable contribution to our business relationships.

**Non-complicity** - Thriving cooperates with customers in observing the potential use of its products and services for illegal purposes. Action will be taken in line with our business policy.

**Confidentiality** - Confidentiality is maintained by Thriving and its employees with regard to its business partners' commercial secrets. The communication of confidential information to third parties or the public is prohibited.

**Company assets** - Thriving employees are expected to be loyal and share the responsibility of protecting the company's assets from loss, damage, misuse and destruction. Company assets shall not be used for personal purposes or in support of activities outside of Thriving Enterprises' scope of business activity.

## SOCIAL

**Human rights** – Thriving supports and respects the protection of internationally proclaimed human rights, and ensures that company activities are not complicit in human rights abuses, for example, in our relationships with our suppliers. In practice this means that:

- We comply with applicable legal requirements relating to human rights.
- We identify, prevent and address actual or potential human rights infringements.

**Discrimination and harassment** - Thriving condemns discrimination in hiring and employment. No existing or potential employee should be discriminated against because of, for example, race, colour, gender, sexual orientation, marital status, pregnancy, parental status, religion, political views, nationality, ethnic background, social origin, social status, disability, age or union membership. The company disapproves of psychological, physical or sexual abuse and verbal harassment or abuse. Integrity, privacy and freedom of expression are guaranteed.

**Freedom of association** - Thriving respects the right of employees to establish or join trade unions and representative organisations of their own choosing in line with applicable local legislation.

**Forced labour** - Thriving will not condone the use any form of forced or compulsory labour by any of our suppliers.

**Child labour** - Child labour and any form of exploitation of children and adolescents will not be tolerated. The corresponding laws must be observed.

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**Labour practices** -Thriving is committed to providing fair compensation and working conditions for all its employees. Working hours shall be set according to the domestic laws in force or industrial standards. All employees are informed and have the right to know the basic terms and conditions of their employment. This code of conduct is equally required of our manufacturing suppliers.

**Health and occupational safety** - Domestic and international regulations are observed by our manufacturing suppliers to ensure occupational health and safety in the workplace. By supporting risk analyses, training programmes and other precautionary measures, our manufacturing suppliers will ensure that employees can perform their work in a safe and healthy manner.

**Product safety** - Food safety plays an increasingly important role in consumers' lives. Our suppliers apply risk awareness and strict hygienic procedures in our operations as well as maintain a high level of expertise in functional barrier packaging, thereby contributing to increased safety of the products packed.

**Land rights of communities** - Thriving will action whenever necessary to ensure that land rights of communities, including indigenous peoples, will be protected and promoted.

## ENVIRONMENT RESPONSIBILITIES

At Thriving we recognise that we have an environmental responsibility to the communities in which we supply Packaging. Consequently, environmental responsibility for us means that our products are designed and produced with environmental consideration.

**Environmental protection** - Thriving promotes sustainability where possible and encourages activities of our manufacturing suppliers to fulfil the requirements and standards for environmental protection and act in an environmentally conscious way.

Thriving and its manufacturing suppliers have the responsibility of ensuring that their employees are aware of this policy. In addition, all white collar employees should sign off that they have understood and will apply the policy. External audits will support the monitoring of compliance with this policy. Non-compliance with the code Violations of this Code of Conduct will be taken seriously and may lead to disciplinary action up to and including termination of employment. In addition, violating the law may subject the company and its customers to substantial criminal fines, custodial sentences and/or civil damages.

**REPORTING VIOLATIONS** - All employees and other stakeholders of Thriving and its manufacturing suppliers who suspect a breach of this policy are encouraged to report the matter to relevant supervisors, plant managers or relevant management.