JNW PACKAGING SDN BHD

ETHICAL CODE OF CONDUCT ON HUMAN RIGHTS AND LABOUR RIGHTS

Our customers, landlords and clients demand quality products and service at all times, and also expects us to ensure that those products are produced ethically and sustainably. We also understand that when people are treated with respect, work in decent conditions and earn fair rates of pay, both they and their companies benefit from increased commitment and productivity.

This Code of Conduct and Human Rights Policy therefore outlines the minimum requirements placed on JNW's suppliers of goods and services concerning their responsibilities towards their stakeholders and the environment. JNW defines their stakeholders as their employees, and also any employees of their subcontractors. JNW reserves the right to reasonably change the requirements of this Policy as necessary to keep up with relevant legislation and to reflect our sustainability targets and ambitions.

Key Principles

✓ Workforce rights
The people working for JNW suppliers are to be treated with respect, and their health, safety and basic human rights must be protected and promoted. Each supplier must strive to comply with the Ethical Trading Initiative base code (detailed below), which JNW has adopted as our international standard, and with all relevant local and national laws and regulations.

✓ Modern slavery
JNW does not tolerate any form of slavery, forced labour or human trafficking within or business or our supply chain. We expect our suppliers to have satisfactory processes for managing the risks associated with modern slavery within their business. All suppliers are required to inform JNW immediately should they become aware of any actual or suspected slavery, forced labour or human trafficking in their supply chain in respect of any products, services or component parts supplied to JNW.

✓ Environmental standards
JNW suppliers must act in accordance with the applicable statutory and international standards regarding environmental protection. We also encourage our suppliers to;

- Monitor, measure and minimize environmental pollution and work to improve environmental performance where possible;
- Use manufacturing processes that:
  – are energy and resource efficient
  – contain minimal use of virgin or rare materials
  – maximise use of post consumer materials where possible
  – are non polluting
  – recycle materials where appropriate
- Report on these impacts and activities

✓ Subcontracting
Suppliers who use subcontractors are responsible to ensure that any subcontractors are aware of the standards set out in this Code of Conduct or have an equivalent policy in place.

✓ Auditing and continual improvement
To ensure adherence and continual improvement against this agreement, JNW reserve the right to visit and assess our suppliers' operations when it is deemed appropriate. We expect our supplier to support this process fully and also to encourage their own suppliers to work to these principles.

This policy will be reviewed by the Board on an annual basis. HR is specifically tasked with keeping the Executive Committee advised on compliance with the policy and ensuring that suitable support is available to the businesses.

THE ETHICAL INITIATIVE BASE CODE

1 EMPLOYMENT IS FREELY CHOSEN

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge 'deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3 WORKING CONDITIONS ARE SAFE AND HYGIENIC

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4 CHILD LABOUR SHALL NOT BE USED

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5 LIVING WAGES ARE PAID

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6 WORKING HOURS AND BREAKS

6.1 Working hours comply with Labour laws, whichever affords greater protection.

6.2 In any event, workers shall not on a regular basis be required to work in excess of 45 hours per week, shall not work more than 12 hours per day and shall be provided with at least one day off for every 7 days period on average.

6.3 Overtime shall be voluntary and shall not be demanded on a regular basis and shall always be compensated at a premium rate.

6.4 The number and duration of breaks must allow for the nature of work and should afford the employees time for eating, drinking, resting, going to the toilet without prompting disciplinary measures.

7 NO DISCRIMINATION IS PRACTISED

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8 REGULAR EMPLOYMENT IS PROVIDED

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or sociality laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or homeworking arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9 NO HARSH OR INHUMANE TREATMENT IS ALLOWED

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject to apply that provision which affords the greater protection.

APPENDIX B: Definitions

Child: Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply.

Young Person: Any worker over the age of a child as defined above and under the age of 18.

Child Labour: Any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.