1.0 Title

Code of Conduct Corporate Social Responsibility (CSR) and Responsible Business Alliance (RBA)

2.0 Scope

Input:

2.1 The Code of Conduct is based on local laws, Corporate Social Responsibility (CSR) and Responsible Business Alliance (RBA) industry standards. Code of Conduct establishes standards to support human right of workers, and to treated them with respect and dignity. The accepted labor standards including child labor, non-discrimination, working hours, human treatment, freedom of association, freely chosen employment, wages and benefits, safety and health, environments, management system and ethics.

3.0 Responsibility

3.1 HR DH shall ensure this process is carried out effectively
3.2 All DH/supervisor shall comply with clauses stated.
3.3 All HR personnel shall assist HR DH in executing the assigned task.

4.0 Definition

4.1 Dept: Department
4.2 DH: Department Head
4.3 HRA: Human Resource/ Administration.
4.4 HR Dept.: Human Resource Department
4.5 HR Personnel: All HR management and non-management staffs.
4.6 RBA: Responsible Business Alliance
4.7 CSR: Corporate Social Responsibility
4.8 EHS: Environment, Health & Safety

5.0 Reference

5.1 Under Age (PPNT-HRA-SI-006)
5.2 Anti-Bribery and Corruption Procedures (PPH-MRS-SP-001)
5.3 Buku Panduan Pekerja Public Packages Holdings Berhad
5.4 Responsible Business Alliance Code of Conduct v6.0 Manual (Customer manual)
5.5 Code of Conduct (CSR/RBA) self-assessment questionnaire (PPNT-HRA-028)
5.6 Purchasing Process (PPNT-MAT-SP-002)

6.0 Purposes

6.1 To ensure the human rights of workers, and to treat them with respect and dignity included in the labor standards stated in the CSR and RBA are compliance with child labor, non-discrimination, working hours, human treatment, freedom of association, freely chosen employment, wages and benefits, management system and ethics.

7.0 Description

7.1 Child Labor

7.1.1 Child labor shall not be used in company of manufacturing. “Child” are prefer to person under the age of 18.
7.1.2 Identity card will verify before in to factory area. Any individual that found below the age limit shall be prohibited from entry and will report directly to the HR Department which the requirement was implemented below Under age (PPNT-HRA-SI-006).
7.1.3 Company shall not use child labor and the requirement was implemented in FSC Chain of Custody Management System procedure (PPNT-FSC-001) and FSC Core Labour Requirement Policy (FSC A2).

7.2 Non-Discrimination

7.2.1 All DH/ supervisor shall ensure not be any form of discrimination in their section.
7.2.2 HR DH shall ensure all workers are entitled a protection from all forms of discrimination in employment and occupation. No discrimination of workers based on race religion, belief, gender, marital or maternal status, age, political affiliation, national origin, disability, sexual orientation or any other basis.

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7.2.3 Company shall ensure that there is no discrimination in employment and occupation and the requirement was implemented in FSC Chain of Custody Management System procedure (PPNT-FSC-001) and FSC Core Labour Requirement Policy (FSC A2).

7.3 Working hours

7.3.1 HR personnel checking working hours are not exceeding the maximum hours set by local laws.

7.3.2 All workers entitle at least one rest day after six of days of continuous work and overtime work must be voluntary by workers.

7.3.3 Working hours should follow local laws except in emergency or unusual situations.

7.4 Human Treatment

7.4.1 All DH/ supervisor shall ensure no engagement in or support use of punishment, threats of violence or other forms of mental or physical coercion and verbal abuse.

7.4.2 All workers have a right to report and appeal for reprimands /disciplinary actions/any harassment.

7.4.3 All workers shall be treated with respect and dignity. Company's discipline policy should be clearly defined and communicated to all workers.

7.5 Free of Association

7.5.1 All workers are free to join trade unions of their own choice or their personal decision and allowed to bargain collectively in peaceful meeting and assembly without penalty.

7.5.2 Trade union representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, aggression or harassment.

7.5.3 Company shall respect freedom of association and effective right to collective bargaining and the requirement was implemented in FSC Chain of Custody Management System procedure (PPNT-FSC-001) and FSC Core Labour Requirement Policy(FSC A2).

7.6 Freely Chosen Employment

7.6.1 All workers are voluntary and free to leave work at any time or terminate their employment and freely to access and withdraw their identity or immigration documents, such as government-issued identification, passports or work permits.

7.6.2 All workers shall not be required to pay employers for recruitment fees or other related fees for their employment.

7.6.3 HR Department shall ensure no forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used.

7.6.4 HR personnel shall provide workers with a written employment agreement in their native language upon arrival.

7.6.5 Company shall eliminate all forms of forced and compulsory labour. The requirement was implemented in FSC Chain of Custody Management System procedure (PPNT-FSC-001) and FSC Core Labour Requirement Policy(FSC A2).

7.7 Wages and Benefits

7.7.1 All workers wages and benefits shall be paid in a timely manner and meet minimum requirement which follow by local laws.

7.7.2 All workers shall be compensated for overtime at pay rates greater than regular hourly rates and deduction from wages as a disciplinary measure shall not be permitted will comply with local laws.

7.8 Management System

7.8.1 HRA personnel shall ensure supplier are comply CSR and RBA requirement and distribute the Code of Conduct (CSR/RBA) self-assessment questionnaire (PPNT-HRA-028) to major vendor/supplier via email (online) or on site audit upon decision by management. Audits shall be conducted by every two years.

7.8.1.1 Supplier shall complete Code of Conduct(CSR/RBA) self-assessment questionnaire (PPNT-HRA-028). This to prove our vendor/supplier had provided working conditions in the industry supply chain are safe, workers are treated with respect and dignity and manufacturing processes are environmentally responsible.

7.8.1.1.1 Major vendor/supplier refer to supplier category A mention in Purchasing Process (PPNT-MAT-SP-002) included sub mat and raw mat supplier.

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Top 3 major vendor/supplier will evaluate based on their frequently purchase (quantity).

7.8.1.2 Code of Conduct(CSR/RBA) self-assessment questionnaire (PPNT-HRA-028) shall evaluated based on mark from questionnaire return .

7.8.1.2.1 CSR/RBA scoring system is calculated as per table below :

Rating Scale	
Yes	No
Represent 1 mark	Represent 0 mark

Scoring	Judgement
0-10	Fail
11-22	Pass

7.8.2 The evaluation results shall be feedback to vendor/supplier at the end of evaluation.

7.8.3 Supplier need to provide improvement action if they fail the judgement of the result. This activity will be follow up by HR Personnel.

7.9 Ethics

7.9.1 HR DH shall ensure company practices zero tolerance policy toward workers, customers and supplier to forbid all forms of corruption, overcharge, bribery and misappropriation.

7.9.2 All DH/supervisor shall ensure workers transparently and accurately in all business practice, financial and applicable all industrial regulation. All personal information of workers, customers, and suppliers are protected. Manipulation of records and information or misrepresentation in all activity is not allowed and unacceptable.

7.9.3 All DH/supervisor shall ensure workers meet social responsibilities and adhere to the highest standard of ethical requirements to business integrity to prohibit corruption and bribery (Anti-Bribery and Corruption Procedures (PPH-MRS-SP-001).

7.10 Health & Safety

7.10.1 Company shall provide a safe and healthy working environment for all workers and protect others who may be affected by its activities.

7.10.2 HRA Department shall provide relevant information, instruction and training to all worker regarding method to carry out their duties in safe manner and without causing any risk to health.

7.10.3 Appropriate training shall be conducted to exercise emergency precaution and promote workplace safely.

7.10.4 The related Health and Safety document shall refer to the Master List of Standard Procedure (PPNT-DOC-R-004) and Master List of Standard Instruction (PPNT-DOC-R-005).

7.11 Environment

7.11.1 Company shall ensure manufacturing activity comply with all applicable environmental policies, legal requirement and customer requirement.

7.11.2 EHS Personnel and related department shall monitor and manage all production processes including raw materials, chemicals handling, emissions, effluent discharges and disposal of hazardous waste to minimize negative impacts on the environment.

7.11.3 The related Environment document shall refer to the Master List Standard of Procedure (PPNT-DOC-R-004) and Master List Standard of Instruction (PPNT-DOC-R-005).

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