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A. RESPONSIBILITIES

Written by:	Deca Production (LV)						
Approved by:	Operations	Quality	Production	Technical	Maintenance	Moulding	Automation
							
Date of signing:	18/08/20	20/08/20	19/08/20	20/08/20	24/08/20	20/08/20	20/08/20
Managed by:	LV				Vrijgavedatum:		24/08/2020

B. INTRODUCTION

Integrity is a personal quality and implies that you have a sense of norms and values, that you respect the interests of others and that you are honest and reliable.

Integrity is doing the right thing, even when no-one is looking.

The values of Deca Packaging Group (“DECA”) serve as guidelines which define how we act in our organization. You use these values as a reference in your daily decisions.

Management sets an example and it is its duty to actively promote this policy. It informs its employees of this policy and ensures that they comply to it.

DECA is committed to conduct business with honesty and integrity, to respect the law and to ensure that all business partners are treated with respect. DECA is proud of its reputation as a responsible and reliable partner. We therefore set high expectations for ourselves to conduct business in an honest, open and ethical manner. Our customers and business partners have the same high expectations.

This code of conduct contains rules regarding ethical behaviour that all Deca employees must follow. This standard, along with common sense, is the foundation of good behaviour. This code is not intended to cover all possible situations. The code is made with the intention of being a reference to evaluate activities.



Patrik De Cat
Managing director
August 7, 2020

C. CODE OF CONDUCT

1. Responsible behaviour at work

DECA's IT and communication tools are made for professional purposes. The capacity, security and software are not developed for private activities. Private activities should be limited as much as possible. It is therefore prohibited to regularly visit websites, email, use social media and download software and / or data for private matters during office hours, as this can damage DECA's system or reputation. DECA can monitor your internet and e-mail traffic in case of suspected abuse.

2. A sustainable and healthy work environment

We care about the health and safety of our employees. This has the highest priority within DECA. We strive for continuous improvement of health and safety aspects. We all strive for zero accidents because we believe that working in an unsafe situation is avoidable. Everyone who works at DECA has the right to say "STOP" if he or she sees colleagues or partners who act unsafe and/or irresponsibly.

The use of alcohol, drugs or psychoactive medication during workhours or activities linked to DECA will affect the way you work/act and can lead to unsafe situations and inappropriate behaviour. Misuse of such substances will not be tolerated.

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There is a zero tolerance for alcohol and drugs. The possession, use or being under the influence of drugs and alcohol during working hours is prohibited. It is prohibited to take drugs and alcohol onto DECA property. This ban also applies during the sale, purchase, transfer, or other improper dealing in such products. These subjects are discussed in more detail in the DECA labour standard.

3. Business responsibility

DECA takes responsibility for energy, waste, purchasing, personnel, safety and health. The same is expected of all employees.

4. Business integrity

4.1 Compliance to the law

DECA is compliant to all local and European regulations related to its business activities. DECA respects human rights and does not participate in child labour. DECA trusts you to familiarize yourself with the law and regulations. Your manager can guide you in how you can comply with this.

4.2 Prevention of fraud

Fraud occurs when you misuse company resources or when you knowingly conceal, alter, falsify or omit information. DECA uses a number of extensive measures to prevent fraud.

DECA expects you to perform your work in a reliable and honest manner. By this we mean: do not lie, do not steal, do not abuse company property or the property of colleagues, ...

Deceit or abuse that would benefit you as an employee is prohibited.

4.3 Corruption and Bribery

Corruption is obtaining or attempting to obtain a personal or business advantage through improper or illegal means (e.g. intimidation / bribery). Corruption threatens business activities and society in general. DECA opposes any form of corruption and applies zero tolerance towards this matter.

Do not attempt to bribe a person, an organization or a company in any way. It is prohibited to do business by offering or receiving anything of value by means of corruption.

This is why it is important that you never receive a gift from customers, suppliers, third parties, ... with a value greater than €50 (or the local equivalent). If you think that refusing these is against local customs, please discuss this with management first.

You are obliged as an employee to inform your manager if customers, suppliers, third parties, ... offer you a gift.

4.4 Accurate bookkeeping and reporting

All reporting, accounting, financial statements and statements of expenditure must be maintained consistently and accurately so that they accurately reflect all applicable legal requirements and internal rules.

5. Dealing with suppliers

DECA selects and assesses its suppliers based on objective comparison criteria, which includes commercial conditions, reputation, sustainability and reliability. Suppliers who own a similar code of conduct are preferred.

6. Authorization and approval

We expect you to be properly authorized or to notify your superior regarding certain business practices. The aim is not to undermine entrepreneurial spirit, but to avoid the danger of improper representation.

7. Discrimination and respect

Each director, manager and employee is responsible for creating and maintaining a workplace culture of respect that is free of discrimination and bullying. We respect and value the diversity of people. DECA provides equal opportunities for all of its employees.

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All employees must respect each other and work together to pursue DECA's objectives, regardless of race, ethnicity, religion, nationality, gender, sexual orientation, disability, age, family situation or other factors. Discrimination is unacceptable.

Harassment and intimidation are completely inappropriate and unacceptable. We do not accept offensive comments about religion, race, ethnicity, gender or age. We do not accept unwanted sexual advances, inappropriate physical contact, threatening gestures or displays of violence.

You should always treat your subordinates, colleagues and supervisors with respect and honesty. This also applies to DECA's customers and suppliers, including their employees and supervisors.

Employees who feel that our workplace does not comply with one of the above principles can report this to the HR department or to Provikmo (details can be found in the DECA labour standard.).

8. Confidentiality

We value and protect our confidential information and respect that of others. We interpret confidential information as all information that may not (yet) be made public. This may include, but is not limited to, trade secrets, marketing and manufacturing ideas, consumer insights, engineers and manufacturing ideas, designs, databases, archives, payroll information and non-public financial data.

All DECA employees do the necessary to prevent inadvertent disclosure of these matters by taking extra care during storage and transmission of confidential information. Confidential information of costumers or business partners are treated like confidential information of DECA itself.

9. Social media

Respect the privacy of others. Be attentive and respectful when you are active on social media, online forums, blogs, ... Emphasize that you speak your personal opinion and not that of DECA (unless you have obtained permission to do so).

Be loyal to DECA and your colleagues. An open and critical attitude is good, but be careful with direct criticism. It is better to express it directly than on an open internet forum with a large audience. Think carefully before distributing images or texts that relate to your colleagues or workplace.

Respect the law, rules and procedures. Do not disclose confidential information and respect applicable rights, such as copyright. Be aware that everything you publish on social media will remain public for an indefinite period, even if you delete your post.

Use common sense and behave like a professional employee of our organization. After all, your behaviour contributes to our image.

10. Failure to comply with the code of conduct

It is the responsibility of each employee to ensure strict adherence to this code and to seek guidance from their manager where necessary. Every employee has the responsibility to do the right thing and to ensure that the highest integrity standards are achieved.

You NEVER have an excuse for violating this code of conduct, this integrity policy, the law, rules or general provisions of DECA, even if you want to achieve certain objectives.

If you engage in unethical and / or unlawful acts or if you organize, tolerate, approve or facilitate such acts, you are acting against the interests of DECA

Violations against this policy can violate relationships of trust and can therefore end employment. Violations of the law can lead to legal proceedings and sanctions, and in some cases, even prosecution. Should it ever come to that, we expect full cooperation and honesty from you as an employee.

Employees should preferably confront each other whenever they observe committed violations (e.g. bullying). Employees can also report violations to their direct supervisors whenever they cannot directly confront their colleagues about this. As a last resort, employees can report violations anonymously. They can do this by sending a letter (without sender) to *Liesbeth De Cat, Toekomstlaan 28, 2200 Herentals*. Depending on the exact circumstances, this person involves the necessary managers into the solution of the problem.

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11. Reporting deviant behaviour

If you notice or suspect that someone is violating the rules of conduct, you have an obligation to report this to management. DECA is committed to an open atmosphere in which employees feel free to speak up when they have genuine concerns.

Working for a company with an excellent reputation is something to be proud of.

It is good to know that any report will be treated confidentially and that DECA prohibits retaliation against any employee who reports such conduct in good faith, while also protecting the rights of the accused.

D. GOEDKEURING

By signing this document, I declare as an employee that I have read, understood and agreed to the 2020 code of conduct and that I promise to act accordingly.

Date, name and signature of the employee