



MD PACKAGING INC.

CODE OF ETHICS

MD Packaging Inc. is committed to conduct business in a professional, honest and ethical manner and to comply with the law wherever it conducts business. MD Packaging expects all employees to conduct their business in a professional, honest and ethical manner, and to comply with all applicable laws wherever they do business, including laws relating to employment, human rights, the environment and health and safety.

Supplier Code of Ethics

Providing or receiving gifts, personal favors or any other benefit which might influence or raise doubts as to the impartiality of the recipient and damage the reputation of MD Packaging for fair dealing are prohibited.

GOVERNING PRINCIPLES

1. CONFLICTS OF INTEREST

MD Packaging Inc. will conduct business in a professional, honest, ethical and transparent manner. Employees should not engage in any activity that gives rise to an actual or perceived conflict of interest.

(a) Entertainment, gifts and payments

Providing or receiving gifts of money, goods or services solely for personal use, personal discounts, loans, gifts of non-business related travel or accommodations, personal favors or any other benefit which might influence or raise doubts as to the impartiality of the recipient and damage the reputation of MD Packaging for fair dealing are prohibited.

Certain business courtesies such as payment of a reasonable amount for a lunch or dinner in connection with a business meeting normally would not be a gift within the context of this policy. Advertising novelties would not be inappropriate to give or receive, provided the item is of insignificant value and is widely distributed to others under essentially the same business relationship with the customer.

(b) Illegal payments

Offering or accepting bribes, kickbacks or improper payments of any kind is strictly prohibited, without exception, in all circumstances.

2. CONFIDENTIALITY OF INFORMATION

Employees are responsible for complying with their obligations to protect Confidential Information of MD or of any customer, supplier or business partner of MD and ensuring that such Information is only used for the purpose for which it was provided.

Each employee shall adhere to and comply with the non-disclosure agreement it enters into with MD and its customer. In the absence of a non-disclosure agreement, each employee must treat all information of, or supplied by MD, its customers, other suppliers and/or other business partners which is confidential, proprietary and/or not otherwise publicly available as Confidential Information including trade secrets, know-how, designs, inventions, techniques, processes, prototypes, undisclosed patents pending, finances, personnel records, business plans and proposals, capacity and production information, marketing or sales forecasts and strategies, client and customer lists, pricing lists or strategies, construction plans, supplier data, business leads, and all information relating to MD customer projects.

3. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Each employee shall comply with all laws and regulations that apply to it wherever it conducts business and shall not, at any time, take any action which it or its employees knows, or reasonably should know, may be in violation of any applicable law or regulation, including but not limited to the following:

(a) Health and safety

Employees are required to follow safe work practices and comply with all applicable health and safety guidelines relating to their work, including governmental requirements, operations and facility-specific safety requirements, and contractual requirements. Suppliers are fully responsible for the health, safety, and continuous training of their employees. Suppliers shall minimize risks and implement best practice preventive measures against accidents and occupational illness, including an occupational health and safety management system.

(b) Environmental responsibility

Employees are expected to conduct their business in an environmentally responsible manner and not to engage in any activity that violates environmental laws or regulations wherever they conduct business.

(c) Employment practices

MD Packaging Inc. will adhere to local employment laws, including those related to maximum hours of daily labor, rates of pay, minimum age, privacy and other fair working conditions. MD promotes equal opportunities and the equal treatment of all employees.

(d) Reporting of violations and other illegal or unethical behaviour

Any employee or Customer's employee who becomes aware of any illegal or unethical behavior and/or any violation of this Code of Ethics has a responsibility to report his or her knowledge promptly to the CEO of MD Packaging Inc, by writing jaime@mdpackaging.com. Except as required by law, persons reporting concerns may request that they remain anonymous. MD Packaging makes every attempt to protect the confidentiality of information provided, unless maintaining confidentiality would create a significant health, safety or legal risk.