



## CODE OF ETHICS AND BUSINESS CONDUCT

**“Building Partnerships in Packaging.”  
We Respond, We Perform, We Care, We Lead**

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# Code of Ethics and Business Conduct Policy

## 1. Purpose and Scope

This Code of Ethics and Business Conduct ("the Code") establishes the ethical standards and professional behaviors expected of all employees, managers, and executives of Royal Containers Ltd. It applies to all business activities and interactions with stakeholders, including customers, suppliers, competitors, and the general public.

## 2. Core Values

Our company is committed to upholding the following core values:

- We Respond
- We Care
- We Perform
- We Lead
- Environmental Sustainability Alignment and vertical Integration supply chain

## 3. Ethical Standards

### 3.1 Compliance with Laws and Regulations

- Adhere to all applicable local, national, and international laws and regulations.
- Maintain accurate and complete business records.
- We provide employees with proper working hours with lunches and breaks when applicable, as well as provide proper compensation for their work.
- We do not enforce or utilize child labour or forced labour of any kind.

### 3.2 Conflicts of Interest

- Avoid situations where personal interests conflict with the company's interests.
- Disclose any potential conflicts of interest to management.

### 3.3 Confidentiality and Data Protection

- Safeguard confidential information of the company, employees, and stakeholders.
- Comply with data protection and privacy laws.

### 3.4 Fair Dealing and Competition

- Engage in fair and ethical business practices.
- Refrain from anti-competitive behaviors or unfair advantage through manipulation or abuse of privileged information.

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## 3.5 Anti-Bribery and Corruption

- Prohibit offering, giving, or receiving bribes or kickbacks.
- Comply with all anti-corruption laws and regulations.

## 4. Workplace Conduct

### 4.1 Respect and Non-Discrimination

- Treat all individuals with dignity and respect.
- Promote a diverse and inclusive work environment free from discrimination and harassment.

### 4.2 Health and Safety

- Prioritize workplace safety and adhere to all safety protocols.
- Report any unsafe conditions or behaviors promptly.
- Comply with workplace Health and safety guidelines as identified by Canadian (Federal) and Ontario (Provincial) governments.

### 4.3 Use of Company Resources

- Use company assets and resources responsibly and for legitimate business purposes only.

## 5. Environmental Responsibility

- Strive to minimize environmental impact in all business operations.
- Comply with environmental laws and regulations.

## 6. Reporting Violations

- Report any suspected violations of this Code to immediate supervisors, HR, or through the anonymous reporting hotline.
- The company prohibits retaliation against individuals who report concerns in good faith.

## 7. Enforcement

Violations of this Code may result in disciplinary action, up to and including termination of employment or business relationships.

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## 8. Acknowledgment

All employees are required to read, understand, and comply with this Code.

By signing this code of Code of Conduct, I hereby acknowledge that Royal Containers complies with all required social responsibility criteria.

Royal Containers,

*Martin Todd – Director of Quality & Safety*

A handwritten signature in black ink, appearing to read 'Martin Todd', is enclosed in a light gray rectangular box.

This policy shall be reviewed every two years or earlier if required to ensure the effectiveness of the policy. January 7, 2025, Rev#2.0