



Code of Conduct

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Introduction

For the purposes of this document “Mitchell Plastics” refers to Ultra Manufacturing Limited and any of its subsidiaries.

As our company continues to grow our business becomes more and more complex. Doing the right thing has become more complicated and is more important than ever as our reach extends further across the globe. This code of conduct is intended to give our team members the information they need to guide their actions in an ever challenging environment. It is critical that Mitchell Plastics employees conduct themselves with the highest ethical standards so that we can earn the trust of our customers, suppliers, employees and the communities in which we operate. Following the guidelines in this handbook will not only help us do the right things but will help us enhance our reputation as an outstanding and responsible corporate citizen. Our future success depends on it.

Refer to Corporate Responsibility Statement QMS-008

1.0 Adherence to Applicable Legislation and Regulations

Mitchell Plastics and its employees are expected to comply at all times with all applicable laws and regulations. Mitchell Plastics will not condone the activities of any employees who violate the law or engage in unethical business practices, regardless of whether an unlawful act is motivated “in the interests of the company” or “in the interests of the customer”. No activity may be carried on that will not stand the closest public scrutiny. Accordingly, employees must ensure that their conduct cannot be interpreted as being in any way in contravention of the laws and regulations governing Mitchell Plastics’ operations. If you are in doubt about the application or interpretation of any legal requirement, you should refer the matter to your supervisor or manager.

2.0 Workplace Environment

2.1 Health and Safety

Mitchell Plastics is committed to protecting the health and safety of its employees and visitors. Safety must be the most important factor in any decision. Compliance with legal requirements for health and safety represents a bare minimum. Whenever necessary and appropriate, we establish standards of our own which may go beyond legal requirements. In seeking ways to improve health and safety, the cost of such measures should not rule out the implementation of any such reasonable alternatives. Our goal is zero injuries and to achieve this we must each take personal responsibility not only for our own health and safety but for all those around us.

Refer to the Health & Safety Policy Statement QMS-009

2.2 Substance Abuse

Substance abuse poses a threat to all of us in virtually every aspect of our lives, including the workplace. For the protection of all, it is imperative that the workplace be free from substance abuse, including use or possession of illegal or illicit drugs, and alcohol abuse. You may not use, possess, manufacture, distribute, dispense, transport, promote, or sell illegal or illicit drugs or drug paraphernalia while on Company business or on Company premises. You are prohibited from being at work or on Company business while under the influence of, or impaired by, alcohol or illegal or illicit drugs.

2.3 Discrimination

Mitchell Plastics is committed to equal opportunity in employment and to fostering diversity in our work force. Our hiring policies and practices require that there be no discrimination because of race, color, religion, age, gender, sexual orientation, gender identity or national origin. We recognize that diversity in our work force is a valuable asset, and we strive to provide an inclusive work environment in which different ideas, perspectives, and beliefs are respected. Violations of the Company's equal opportunity Policies may result in discipline, up to and including termination or release.

2.4 Harassment

As part of our commitment to having a respectful and inclusive work environment, the Company has long maintained an Anti-Harassment Policy. Harassment includes language or conduct that may be derogatory, intimidating, or offensive to others. All of us, as well as vendors, customers and other visitors to our premises, are protected under this Policy and are expected to abide by it. Violations of the Company's Anti-Harassment Policy will result in discipline, up to and including termination or release.

Refer to the Workplace Violence & Harassment Policy QMS-003

3.0 Corporate Responsibility

Social responsibility is an inescapable element of the long-term success of our company, just as it is for our stakeholders, business partners, employees and our customers. A plan for true sustainability requires not only that we are a good global citizenship but that we remain competitive in the long term. True social responsibility is not an obstacle but an enabler to this end. These principles are followed by our company and our Suppliers worldwide. This documentation of Corporate Social Responsibility beliefs and expectations notifies every organization and individual in our Supply Chain that they must share in the adherence to these practices.

3.1 Human Rights

We respect and support compliance with internationally accepted human rights policies and laws.

3.2 Forced Labour

We condemn all forms of forced and compulsory labour. Suppliers will not use forced or involuntary labour, whether bonded, prison or indentured, including debt servitude.

3.3 Child Labour

We support the effective abolition of exploitative child labour. Suppliers will not employ individuals in violation of local mandatory school age or under the legal employment age in each country where they operate. In no case will suppliers employ non-family workers under the age of 15.

3.4 Harassment and Discrimination

Suppliers will uphold equal opportunities with respect to employment and will refrain from discrimination in any form unless national law expressly provides for selection according to specific criteria. Discrimination against employees based on gender, race, disability, origin, religion, age or sexual orientation is not acceptable.

3.5 Working Conditions

We are opposed to all exploitative working conditions.

3.6 Protection of health and safety

Suppliers will ensure health and safety at the workplace to a level no less than required by national Legislation and supports the continuous improvement of working conditions.

3.7 Compensation

Suppliers will honour the right to reasonable compensation of a level no less than the legally established minimum-wage and the local job market, based on local laws and regulations. Within the scope of national legislation, suppliers will respect the principle of “equal pay for work of equal value.”

3.8 Working hours

Suppliers will comply with national provisions and agreements regarding working hours and regular, paid holidays.

3.9 Environment

We believe in stewardship of our natural resources. Suppliers will comply with all applicable environmental laws and regulations and will promptly develop and implement plans or programs to correct any non-compliant practices.

3.10 Corruption and Ethics

We will work against corruption in all its forms. We strictly adhere to all local and applicable local laws and regulations related to corruption and ethics, and require its suppliers to act in a similar manner.

3.11 Privacy

We will endeavour to protect the personal information of our employees, customers and anyone else we are engaged in business with, in accordance with each country's laws.

3.12 Protection of intellectual property

All employees should continually monitor and protect the intellectual property of the company against infringement by others and should not infringe the intellectual property of others.

3.13 Responsible Material Procurement

Use deliberation and care in the procurement of materials to prevent purchasing materials which are unlawful or obtained through unethical means (such as conflict materials).

4.0 Conflict of Interest

Each employee is expected to give his or her first business loyalty to Mitchell Plastics. Where we are entrusted with making decisions and choices for Mitchell Plastics it is essential that these decisions are (and are seen to be) free of any inappropriate bias arising from personal relationships or the opportunity for personal gain. Personal relationships with suppliers, customers, and other employees must not affect your ability to act in a manner that is best for the Company.

4.1 Avoiding the Appearance of Conflict of Interest

We must always act in such a manner that your conduct will bear the closest scrutiny. Not only actual conflict of interest, but even the appearance of conflicts is to be avoided. Perception of conflict of interest can be just as damaging to the reputation of the company and its employees.

4.2 Outside Activities

Outside employment, whether for another company or for yourself, can create a conflict of interest. It is strongly discouraged at every level and is prohibited under the following circumstances:

- It interferes in any way with the performance of your duties.
- It is connected in any way with a company that has any business relations with Mitchell Plastics.
- It is connected in any way with a business competitor.
- It calls upon the primary professional skills for which you are employed at Mitchell Plastics.

If you are at all unsure as to whether your outside employment violates the above rules, you should check with your supervisor and ensure that the conclusion is documented.

4.3 Bribes and Kickbacks

As Mitchell Plastics Employees we do not offer, give, solicit, or receive any form of bribe, kickback, or improper inducement in order to secure business from customers, award contracts to suppliers or gain regulatory approval. This applies to all transactions everywhere in the world, even where the practice is widely considered “a way of doing business.”

4.4 Purchasing Decisions

We never exert influence to obtain special treatment on behalf of a particular supplier. It is essential that suppliers competing for Mitchell Plastics’ business have confidence in the integrity of our selection process.

Mitchell Plastics Employees are not to solicit suppliers for charitable donations. Due to the unique community responsibility of the Chief Executive Officer, this policy does not prohibit the Chief Executive Officer of the Company from soliciting suppliers for charity donations.

Personal relationships may sometimes develop with suppliers and customers. Asking these suppliers or customers to provide products or services for you or others can create a real or perceived conflict of interest. We refrain from all such activities. If you learn of such activities you should report them in confidence to your manager.

From time to time, suppliers who may be relatives or friends of Mitchell Plastics employees solicit business from Mitchell Plastics. In these situations it may be difficult to maintain objectivity in your decisions. Although it is not strictly prohibited to do business with these suppliers it is required that you disclose any such relationships to your supervisor.

4.5 Family and Friends within the Company

Mitchell Plastics supports relatives working in the organization as we are always trying to attract top talent. However, it is our strong preference that they should not report within the same organizational line or where there is a significant sphere of influence. In this respect, relatives are defined as direct family members plus grandparents, grandchildren, aunts, uncles, cousins, siblings and those who share a conjugal relationship. The same organizational line means a reporting relationship whereby, the junior person would fall under the supervision of the senior one if you traced a line up the organizational chart. Significant sphere of influence refers to a situation where one relative, although in a different reporting line, still could have significant influence over the other relative.

4.6 Gifts and Entertainment – We Pay Our Own Way

Receiving gifts or entertainment from suppliers, potential suppliers or customers is against Mitchell Plastics' policy. We believe that the "we pay our own way" philosophy sends a powerful message with respect to our ethical standards, which can only enhance our business reputation.

Certain token gifts of nominal value (less than \$30) may be accepted from time to time. e.g. pen, stationary, organizer, calendar, etc.

It is recognized, however, that some business entertainment or social activity with business associates may be appropriate and beneficial to Mitchell Plastics when undertaken with discretion. If there is a good business case for entertaining or socializing with business contacts in your role as a Mitchell Plastics Employee, you must pay for all costs of such entertainment and apply for reimbursement through the established expense claim process.

If you participate in business related entertainment that advances Mitchell Plastics' interests but where it is inappropriate or impossible for Mitchell Plastics to pay (e.g. social courtesy and grace would make attempted payment offensive to the host) then you should accept the entertainment graciously on behalf of Mitchell Plastics and disclose it to your supervisor in writing, preferably in advance.

5.0 Company Assets

As employees each of us is responsible for protecting the Company's assets and ensuring that they are used for Company business purposes and in accordance with Company policies.

5.1 Care of Company Assets


You are responsible for the proper use and security of company property entrusted to you. You should ensure that all Mitchell Plastics property assigned to you is maintained in good condition. You should be able to account for such equipment at all times in accordance with established procedures.

5.2 Personal Use of Company Assets

Any use of Mitchell Plastics property or services that are not solely for the benefit of Mitchell Plastics must be approved in advance by your supervisor or manager. Common sense dictates that some items, such as the occasional phone call on personal affairs or a personal email are acceptable. Use good judgement and, if in doubt, err on the side of disclosure and seek approval from your supervisor.

Company computers and all information contained within these assets are provided to employees as necessary tools for job performance. We are all expected to use these tools in full accordance with our policies.

Company time is a valuable asset. We all have an obligation to be honest with time, to perform your job to the best of your abilities, and to report to work in a manner fit to perform all assigned duties.



If you have any doubt as to the appropriate use of any company property, assets, or services, ask your supervisor.

5.3 Theft of Company Assets

Theft of Company assets is the most fundamental breach of the employment relationship. Mitchell Plastics will not tolerate theft under any circumstances and will terminate and prosecute in such situations.

5.4 Theft from Coworkers, Customers or Suppliers

The company will not condone theft of any kind while on company property or on company business. We must respect the property of others and any acts of theft may be dealt with through legal means and may result in termination.

6.0 Intellectual Property

The Company's various types of intellectual property are highly valuable assets. They are key to our global strategy of using innovation to sell world-class products that are both unique and technologically superior. Intellectual property includes patents, copyrights, trade secrets, know how or any product or process that was developed or marketed by Mitchell Plastics. New ideas or inventions may be protected through a formal patent, or as trade secrets. Regardless of whether an idea is formally protected, it shall remain the property of Mitchell Plastics if it was conceived or developed through the execution of your position within the company.

It is the policy of the Company to secure and protect its intellectual property rights, and to take appropriate action against any individual or group making unauthorized use of our rights.

6.1 Data Privacy and Protection

Data privacy laws safeguard information about individuals. This information includes name and contact details, employment and financial information, age and nationality. Information on race or ethnic origin, religion or philosophical beliefs, health or sexual orientation or criminal behaviour is sensitive personal data.

Mitchell Plastics respects the basic right of individuals to privacy including employees, customers and suppliers. It is often necessary to collect such personal information and Mitchell Plastics will make every effort to ensure that such information is protected from misuse.

Refer to the Employee Handbook Information Technology, Internet & Email Policy.

7.0 The Environment

It is the policy of Mitchell Plastics that our manufacturing operations and products should accomplish their functions in a manner that protects the health of the environment.

Mitchell Plastics is committed to meeting all regulatory requirements; however, when necessary and appropriate, Mitchell Plastics may establish its own standards, which may exceed regulatory requirements. Consideration of potential health and environmental effects should be an integral part of all Company business decisions including those relating not only to the manufacture of our products but also the design and ultimate disposal of those products.

It is clear that strong and profitable companies of the future will be the ones that lead the way for sustainable use of our resources. Mitchell Plastics is focused on many environmental initiatives which reduce our environmental impact not only within our operations but in the products we design and manufacture. These include reductions in the weight of our products, manufacturing emissions, water and energy consumption as well as the recycle and reuse of non-renewable materials and the creation of renewable energy.

We expect all Mitchell Plastics employees to embrace this environmental commitment as they plan and execute their workplace duties.

Refer to Environmental Policy Statement EMS-POL.