Plastipak

code of conduct

June 1, 2018 | Plymouth, MI

The Plastipak Code of Conduct ("Code") applies to all representatives, Associates (defined as any person who is employed by the Company), including but not limited to supervisors, managers, consultants, directors, officers and any other persons whose business activities are conducted for Plastipak Holdings, Inc. and/or any of its subsidiaries (collectively, the "Company").

The Code requires all Associates of the Company to act ethically when conducting the business of the Company. This Code provides a summary of the conduct required from all Associates of the Company, and is a source for guidance, modification, accountability for, and enforcement of its provisions; and is hereby incorporated into the Company handbooks. The integrity of the Company must not ever be compromised for the personal benefit of an Associate, Customer or Supplier. Early identification and resolution of ethical issues are critical to maintaining our commitment to ethical business practices.

If you are unsure of what to do in any situation, seek additional guidance and information from the Company's designated General Counsel. You may remain anonymous. You are responsible to know and comply with the provisions of the Code. Your failure to comply with the Code could result in disciplinary action, up to and including termination of employment. In addition, violation of the Code may also be a violation of either civil or criminal law and may result in civil or criminal penalties for you, your supervisor, and the Company. Understand that company policy and the law prohibit retaliatory action against any Associate for reporting suspected violations of the Code or for raising legitimate concerns or questions regarding ethics matters. This Code does not constitute a contract of employment for a definite term or a guarantee of continued employment.

Tom Jabero General Counsel Plastipak Holdings, Inc.