CODE OF CONDUCT

Effective date: 18 May 2020 | Last revised: October 2026 | Owner: Karen Cheah, Founder & CEO

Alterpacks Pte. Ltd. (UEN 201916069G) ("Alterpacks", "we", "us") is a Singapore-based advanced materials company that upcycles agricultural waste and food-processing by-products into certified home-compostable packaging. This Code of Conduct sets out the standards we hold ourselves to in how we treat our people, conduct our business, communicate with the public, and engage with the communities and ecosystems connected to our work. It applies to all Alterpacks employees and directors and, where relevant, to contractors and suppliers acting on our behalf.

1. Publicly Accessible Grievance Procedure

Alterpacks is committed to providing a fair, accessible, and confidential channel through which employees, suppliers, customers, and members of the public can raise concerns about our conduct, and to resolving those concerns in good faith.

1.1 Grounds for Accepting a Grievance

We will accept and review a grievance relating to any of the following:

- Unfair, discriminatory, or disrespectful treatment of an employee or job applicant.
- Harassment, bullying, or unsafe working conditions.
- A breach of this Code of Conduct, our employment terms, or applicable Singapore employment law.
- Concerns about the accuracy of Alterpacks' marketing, product, or environmental claims.
- Suspected bribery, corruption, or money laundering connected to our business.
- Concerns raised by suppliers, partners, or community members about how Alterpacks has treated them or represented itself in a business relationship.
- Any other conduct reasonably believed to conflict with the commitments in this Code.

Grievances may be raised anonymously and will be reviewed on the same basis as named ones, although anonymity may limit our ability to follow up directly with the person who raised the concern.

1.2 How to Raise a Grievance

Grievances can be submitted through either of the following channels:

- By email to contact@alterpacks.com, addressed to Steven Tan, Chief Operating Officer, who is the designated first point of contact for grievances.
- By post to Alterpacks Pte. Ltd., 587 Bukit Timah Road, #02-07 Coronation Plaza, Singapore 269707, marked for the attention of Steven Tan.

If the grievance concerns the designated contact, or the complainant would prefer not to raise it with him, it may be sent directly to Karen Cheah, Founder & CEO, at karen@alterpacks.com. She is the final point of escalation within Alterpacks.

1.3 Grievance Process

1. **Acknowledgement:** The grievance is acknowledged in writing within five working days of receipt.
2. **Review:** The designated contact confirms that the grievance falls within the grounds set out in Section 1.1 and checks whether a conflict of interest requires the matter to be handled by another member of leadership.
3. **Investigation:** Relevant facts are gathered, which may include speaking with the person who raised the grievance and anyone involved, and reviewing relevant records. Investigations are kept confidential as far as possible and are typically completed within 20 working days. The complainant is informed if more time is needed.
4. **Decision and resolution:** The complainant is informed of the decision and of any actions Alterpacks will take, which may include policy changes, corrective conversations, or disciplinary action. Where a grievance is not upheld, the complainant receives an explanation of the reasoning.
5. **Escalation:** A complainant who is not satisfied with the outcome may ask for the matter to be reviewed by the Founder & CEO, whose decision is final within Alterpacks. External statutory channels, such as Singapore's Ministry of Manpower and the Tripartite Alliance for Fair & Progressive Employment Practices (TAFEP), remain available at any time; this internal process does not replace them.
6. **Record-keeping:** Alterpacks keeps a confidential log of grievances received, key dates, and outcomes, which leadership reviews at least annually.

1.4 How Resolution Is Facilitated

Alterpacks is committed to:

- Handling all grievances confidentially, sharing information only with those who need it to investigate or resolve the matter.
- Protecting anyone who raises a grievance in good faith from retaliation of any kind.
- Approaching every grievance impartially, and recusing any member of leadership with a direct conflict of interest from the review.
- Communicating outcomes and the reasoning behind them clearly to the complainant.

2. Responsible Marketing and Public Relations

Because our business depends on trust in our environmental claims, Alterpacks holds its marketing, sales, and public communications to a high standard of honesty and transparency.

2.1 Truthfulness of Information

- We make only those product, environmental, and certification claims that are accurate and substantiated by current, valid documentation, such as our TÜV Rheinland life-cycle assessment and our DIN CERTCO, SFA, and FDA certifications.
- We do not use vague or unverifiable terms (e.g. "eco-friendly", "green", "sustainable") without stating specifically what makes the product so, in line with good practice on avoiding greenwashing.
- Where a certification or claim is limited in scope (e.g. it applies to home composting under specific conditions, or to a particular product line), our communications make that scope clear rather than implying a broader claim.

2.2 Ethical Data Collection and Marketing

- We collect customer and prospect data only through lawful, transparent means, in line with Singapore's Personal Data Protection Act (PDPA).
- We do not use deception, misrepresentation, or undisclosed incentives to obtain marketing data, testimonials, reviews, or endorsements.
- Comparisons with competing products or materials (e.g. conventional plastics) are based on credible, cited data.

2.3 Transparency and Openness

- Where required by regulation, an industry code, or a specific request, we disclose material information about our products, sourcing, certifications, and business practices to customers, partners, and regulators.
- Sponsored content, paid partnerships, and affiliate relationships are clearly disclosed as such.

2.4 Commitment to Responsible Lobbying

Alterpacks does not currently engage in lobbying or public policy advocacy activities, as defined by the B Lab Standards. This includes direct or indirect communication with public officials, policymakers or their representatives, as well as efforts to influence public opinion beyond normal advertising and marketing practices, with the aim of shaping public decision-making.

Should Alterpacks undertake such activities in the future, the company commits to conducting them transparently and ethically, in a manner that contributes to positive social and environmental impact, consistent with its sustainability mission and applicable laws.

3. Public Commitment to Respect Human Rights

Alterpacks is committed to respecting internationally recognized human rights throughout its operations and business relationships, including those of our employees, contractors, suppliers, and communities affected by our activities and value chain.

Our commitment is guided by the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work and applicable Singapore law. This includes:

- Respect employees' freedom of association and their right to join or form trade unions and engage in collective bargaining, in accordance with applicable laws, without discrimination or retaliation.
- Prohibit all forms of forced or compulsory labor, including modern slavery.
- Prohibit child labor in our operations and work towards its elimination throughout our supply chain.
- Eliminate discrimination in employment and occupation and promote fair and equal treatment.
- Provide a safe and healthy working environment, alongside fair wages and working conditions.
- Consider actual and potential human rights impacts when selecting and working with suppliers and procurement partners.
- Provide accessible channels (see Section 1) through which employees and external stakeholders can raise human rights concerns connected to our business without fear of retaliation.

Alterpacks' leadership reviews this commitment at least annually, as part of the review described in Section 5.

4. Anti-Bribery and Corruption

Alterpacks is committed to conducting business with integrity and has a zero-tolerance policy on bribery and corruption of any kind, in line with Singapore's Prevention of Corruption Act. This policy applies equally to employees, managers, and directors, and to anyone acting on behalf of Alterpacks.

No such person may, directly or indirectly, offer, promise, give, request, accept, or authorise any bribe, improper payment, or other improper advantage in order to influence a business decision or obtain an improper business benefit. This applies to dealings with public officials and with private individuals and organisations alike. Suspected bribery or corruption can be reported through the grievance channels in Section 1.

4.1 Gifts and Benefits

Employees, directors, managers, and others acting on behalf of Alterpacks must exercise appropriate judgement when offering or receiving gifts, and must not offer or accept any gift that could influence, or appear to influence, a business decision.

Gifts received by the Founder or any other employee in connection with Alterpacks business are accepted only on behalf of the company and are shared with all employees. Any gift with an estimated value above SGD 50 is donated to charity. Gifts given in the name of Alterpacks must represent the company appropriately.

4.2 Prevention of Money Laundering

Alterpacks conducts business only through legitimate activities and with business partners whose funds come from legitimate sources. We do not tolerate money laundering, and we will not knowingly take part in any transaction intended to conceal, disguise, or facilitate the use of the proceeds of crime.

5. Governance and Review

This Code of Conduct, together with Alterpacks' public purpose, environmental performance, and stakeholder engagement mechanisms, is discussed by the leadership team at least annually, with outcomes recorded in meeting minutes. The Code is reviewed at that meeting and updated as needed as the business grows.

Contact

Questions or concerns about this Code of Conduct can be sent to Steven Tan, Chief Operating Officer, at contact@alterpacks.com.

Approved by the Executive team of Alterpacks Pte. Ltd.

Karen Cheah	Steven Tan
Founder & CEO, Alterpacks Pte. Ltd.	COO, Alterpacks Pte. Ltd.