

CONFLICTS OF INTEREST POLICY

GENERAL

Directors, officers, employees, representatives, and team and committee participants (collectively "Representatives") of PT Global Plastic Trading and Global Plastic Trading Pty Ltd (GPT) are expected to practice the highest standards of business ethics and comply with all laws and regulations while fulfilling their responsibilities during their involvement with GPT. In order to effectively fulfill their responsibilities, Representatives' decisions and actions are to be made for the purpose of advancing GPT's purposes.

Representatives may have relationships and affiliations with other organizations that could raise questions about potential conflicts of interest. Although such potential conflicts are typically inconsequential, Representatives have the responsibility to ensure GPT is made aware of situations that involve personal, familial, or business relationships that could create a conflict of interest. Representatives are to disclose personal, familial, or business relationships that might reasonably give rise to a conflict of interest involving GPT, and where appropriate, to acknowledge in writing that they are in accordance with the letter and spirit of this policy.

DISCLOSURE OF CONFLICTS INVOLVING FINANCIAL TRANSACTIONS

In the event a financial transaction involving GPT involves: (1) a material financial interest of a Representative or a member of his/her "extended family" (as defined below); or (2) an organization with which a Representative is "affiliated" (as defined below), the Representative having the material financial interest or affiliation is to disclose fully the precise nature of the interest or involvement at first knowledge of the transaction.

ANNUAL DISCLOSURE STATEMENT

In addition to the preceding requirement, each year, GPT's Directors and employees shall submit a disclosure statement, provided by GPT, listing all organizations with which they are affiliated, describing the nature of the affiliation, and indicating whether they have or may have a conflict of interest involving any GPT financial transaction. In the event there is a change in the information in the disclosure statement, the person submitting it is to promptly submit written notification of the change.

DEFINITIONS

A Representative is deemed to be "affiliated with" an organization if the organization has a material financial relationship with the operation of GPT and the organization is one in which:

The Representative, or a member of the Representative's extended family, is a director, officer, trustee, partner, employee, or agent;

The Representative, or a member of the Representative's extended family, receives direct financial benefit from sales or services of the organization; or

The Representative, or a member of the Representative's extended family, has a 35 percent or greater financial interest of the organization.

The term "extended family" shall be deemed to include an individual's spouse, children (including legally adopted children), and spouse of the individual's children.



ADMINISTRATION

GPT's Chief Operating Officer (COO) shall be responsible for administration of this conflicts of interest policy. The administration of this policy will be reported annually by the COO to the Board of Directors while maintaining proprietary business information or other confidential information, as may be required.

RESTRAINT ON PARTICIPATION

A Representative who has declared or has been found to have a conflict of interest in any proposed transaction or other matter is to refrain from participating in consideration of the proposed item, including not voting on the item in question. If so, requested by the Chair or any other Representative, the Representative who has declared or has been found to have a conflict of interest shall not be present at the time of the vote or any related consideration of the matter. With respect to restraint on participation by employees, the COO is to take such action as is necessary to ensure that the transaction or other matter is completed in the best interests of GPT without the involvement of the person who has the conflict of interest.

