



# PackMentor Data Protection and Regulatory Compliance Policy

## 1. Policy Statement and Commitment

PackMentor is committed to operating with the highest standards of integrity, transparency, and accountability. This policy establishes our mandate for two critical areas:

**Data Protection:** The lawful and secure processing of personal data for customers, partners, and employees.

**Regulatory Compliance:** Adherence to all relevant national and international laws governing packaging, product safety, and business operations.

We view strict compliance as essential for maintaining customer trust and ensuring sustainable market access.

## 2. Scope and Application

This policy applies to all PackMentor employees, contractors, suppliers, and third parties acting on behalf of PackMentor, and covers all data and packaging products within our control and influence.

## 3. Data Protection and Privacy

PackMentor processes personal data in compliance with applicable data protection laws, including but not limited to the EU General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and similar global regulations.



### 3.1 Principles of Data Processing

All personal data must be:

Lawfully, fairly, and transparently processed.

Collected for specified, explicit, and legitimate purposes (e.g., fulfilling orders, regulatory reporting).

Adequate, relevant, and limited to what is necessary for those purposes (data minimization).

Accurate and, where necessary, kept up to date.

Kept in a form which permits identification of data subjects for no longer than is necessary.

Processed in a manner that ensures appropriate security of the personal data.

### 3.2 Data Security and Confidentiality

PackMentor implements appropriate technical and organizational measures to ensure data security, including:

Encryption of sensitive data both in transit and at rest.

Access control measures based on the principle of least privilege.

Regular security audits and employee training on data handling protocols.



## 4. Regulatory and Product Compliance

PackMentor operates under a principle of "No-Compromise Compliance" with all laws and regulations relevant to the global packaging industry.

### 4.1 Packaging Legislation (EPR and Circular Economy)

We are committed to helping our customers meet their obligations under Extended Producer Responsibility (EPR) schemes and the European Union's Packaging and Packaging Waste Regulation (PPWR).

**Product Specifications:** All packaging solutions must meet current standards for material composition, recyclability, and permitted chemical use.

**Reporting:** We ensure the collection and accuracy of packaging weight, material, and composition data required for customer compliance reporting in relevant jurisdictions.

### 4.2 Chemical and Product Safety Compliance

All materials supplied by PackMentor must comply with key chemical safety standards:

**REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals):** Prohibiting or restricting hazardous substances in packaging materials sold into the EU market.

**Food Contact Materials (FCM):** Ensuring materials intended for food packaging meet stringent global safety and hygiene standards (e.g., FDA and relevant EU regulations).

### 4.3 Anti-Corruption and Anti-Bribery

PackMentor maintains a zero-tolerance policy for bribery, corruption, and all forms of unethical inducement. All business must be conducted honestly and transparently, in compliance with international anti-bribery laws.



## 5. Monitoring, Reporting, and Consequences

### 5.1 Training and Awareness

All personnel receive regular training on data protection protocols and regulatory updates relevant to their roles.

### 5.2 Reporting Compliance Concerns

Employees and external parties are encouraged to report any suspected breach of this policy through established, confidential reporting channels without fear of retaliation.

### 5.3 Consequences of Non-Compliance

Any failure to comply with this policy, whether intentional or accidental, may result in disciplinary action up to and including termination of employment or termination of the supplier relationship. PackMentor will cooperate fully with relevant regulatory bodies in the event of a breach or investigation.

## 6. Policy Review

This policy is subject to annual review and update by the PackMentor Compliance team to ensure its continued relevance and alignment with changes in statutory, regulatory, and business requirements.