

CODE OF BUSINESS CONDUCT AND ETHICS

I. INTRODUCTION

This Code of Business Conduct and Ethics summarizes the long-standing principles of conduct that AptarGroup, Inc. and its subsidiaries (“AptarGroup” or the “Company”) follow to ensure that business is conducted with integrity and in compliance with the law. Every employee, officer and director is expected to know and follow the policies outlined in this Code of Business Conduct and Ethics. Any employee or officer who violates the letter or spirit of these policies may be subject to disciplinary sanctions, up to and including termination in most serious cases, in accordance with the relevant laws and regulations.

Every employee, officer and director has the responsibility to obey the law and act ethically. To that end, this Code of Business Conduct and Ethics is a guide that is intended to sensitize employees, officers and directors to significant legal and ethical issues that arise frequently and to the mechanisms available to report illegal or unethical conduct. It is not, however, a comprehensive document that addresses every legal or ethical issue that an employee, officer or director may confront, nor is it a summary of all laws and policies that apply to AptarGroup’s business. For additional information regarding AptarGroup policies, you should refer to AptarGroup’s confidential and proprietary Compliance Manual (the “Compliance Manual”). Ultimately, no code of business conduct and ethics can replace the thoughtful behavior of an ethical employee, officer or director.

If you have any questions about this Code of Business Conduct and Ethics or are concerned about conduct you believe violates AptarGroup’s policies or the law, you should consult with the Company’s Compliance Officer: Jim Meyer, email: jim.meyer@aptar.com); at 475 W. Terra Cotta Ave., Suite E, Crystal Lake, Illinois, 60014 USA. Phone: +1-815/477-0424.

No one at AptarGroup has the authority to make exceptions to these policies, other than our Board of Directors or a committee of our Board of Directors.

II. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Employees, officers and directors must comply fully with all applicable laws, rules and regulations that govern AptarGroup’s business conduct, including, without limitation, antitrust laws, employee health and safety laws, Collective Labor Agreement at any level (i.e. national, local and/or company level) when applicable, environmental laws, insider trading laws and the Foreign Corrupt Practices Act.

III. PROHIBITION AGAINST INSIDER TRADING

In general, employees, officers and directors who have access to, or knowledge of, material nonpublic information from or about AptarGroup are prohibited from buying, selling or otherwise trading in AptarGroup’s stock or other securities. “Material nonpublic” information includes any information, positive or negative, that has not yet been made

available or disclosed to the public and that might be of significance to an investor, as part of the total mix of information, in deciding whether to buy or sell stock or other securities.

Such insiders also are prohibited from giving “tips” on material nonpublic information, that is directly or indirectly disclosing such information to any other person, including family members, other relatives and friends, so that they may trade in AptarGroup’s stock or other securities. Furthermore, if, during the course of your service with AptarGroup, you acquire material nonpublic information about another company, such as one of our customers or suppliers, or you learn that AptarGroup is planning a major transaction with another company such as an acquisition), you are restricted from trading in the securities of the other company.

Such “insider trading” is both unethical and illegal, with U.S. criminal penalties of up to \$5 million and a jail term of up to 20 years and civil penalties of up to three times the illegal profit gained or loss avoided.

IV. CONFLICTS OF INTEREST

Business decisions must be made in the best interest of AptarGroup, not motivated by personal interest or gain. Therefore, as a matter of policy, all employees, officers and directors must avoid any actual or perceived conflict of interest.

A “conflict of interest” occurs when an individual’s personal interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of AptarGroup. A conflict of interest situation can arise when an employee, officer or director takes actions or has interests (financial or other) that may make it difficult to perform his or her company work objectively and effectively. Conflicts of interest also may arise when an employee, officer or director, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company, regardless of whether such benefits are received from the Company or a third party. Loans to, or guarantees of obligations of, employees, officers and directors and their respective family members are of special concern. U.S. federal law currently prohibits AptarGroup from making loans to directors and executive officers.

It is difficult to identify exhaustively what constitutes a conflict of interest. For this reason, employees, officers and directors must avoid any situation in which their independent business judgment might appear to be compromised. Questions about potential conflicts of interest situations, and disclosure of these situations as they arise, should be addressed and reported to the Compliance Officer.

V. CORPORATE OPPORTUNITIES

Employees, officers and directors are prohibited from: (a) taking for themselves individually opportunities that properly belong to AptarGroup or are discovered through the use of corporate property, information or position; (b) using corporate property, information or position for personal gain; and (c) competing with AptarGroup. Employees, officers and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

VI. CONFIDENTIALITY

Employees, officers and directors must maintain the confidentiality of all information entrusted to them by the Company, our customers or suppliers, or others with whom we may conduct business, except when disclosure of such information is specifically authorized or required as a matter of law.

Confidential information includes any information that has not been made available to the public that provides insight into our current or anticipated business activities. It also includes important nonpublic information about firms with which we have dealings, including customers and suppliers. You should not share confidential information with friends, relatives or other non-employees, or discuss confidential matters in public places, such as elevators, public transportation (including airplanes) or restaurants.

The Company's policy is to cooperate with every reasonable request of government investigators for information. At the same time, AptarGroup is entitled to all the safeguards provided by law for the benefit of persons under investigation or accused of wrongdoing, including legal representation. If a representative of any government or government agency seeks an interview with you or requests access to data or documents for the purposes of an investigation, you should refer the representative to the Compliance Officer. You also should preserve all materials, including documents and e-mails that might relate to any pending or reasonably possible investigation.

VII. FAIR DEALING

Each employee, officer and director must endeavor to deal fairly and in good faith with AptarGroup's customers, suppliers, competitors, and employees. No employee, officer or director shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practices.

The Company's policy is to select, place and work with all our employees and officers without discrimination based on race, color, national origin, politics, language, union participation or activity, gender, age, religion, disability, veteran's status, or actual or perceived sexual orientation. Equal opportunity is one of AptarGroup's fundamental and most steadfast beliefs.

Further, it is the responsibility of each of us to help the Company provide a work atmosphere free of harassing, abusive, disrespectful, disorderly, disruptive or other nonprofessional conduct. Sexual harassment in any form, verbal or physical, by any employee, officer or director will not be tolerated.

VIII. PROTECTION AND PROPER USE OF COMPANY ASSETS

All employees, officers and directors must protect AptarGroup's assets and ensure their efficient use. Such assets include, without limitation, intellectual property such as the Company name, logos, trademarks, patents, copyrights, confidential information, ideas, plans and strategies. Theft, carelessness and waste have a direct impact on the Company's

profitability. All company assets should be used only for legitimate purposes. Any misuse or infringement of the Company's assets should be reported to the Compliance Officer.

IX. PUBLIC COMPANY REPORTING

As a result of our status as a public company in the United States, AptarGroup is required to file periodic and other reports with the U.S. Securities and Exchange Commission. AptarGroup takes its public disclosure responsibility seriously to ensure that these reports furnish the marketplace with full, fair, accurate, timely and understandable disclosure regarding the financial and business condition of the Company.

X. REPORTING ILLEGAL OR UNETHICAL BEHAVIOR

All employees, officers and directors have a duty to adhere to this Code of Business Conduct and Ethics.

Employees are encouraged to talk to supervisors, managers or other appropriate personnel about possible illegal or unethical behavior that has occurred and, when in doubt, about the best course of action in a particular situation.

If you are concerned about a violation of this Code of Business Conduct and Ethics or other illegal or unethical conduct by employees, officers or directors of the Company solely in the fields of accounting, internal accounting controls, auditing matters and combating against bribery or banking and financial crime (for example: accounting and account auditing disorders, false entries, tax evasion etc...) or if you are aware of serious facts that affect the vital interests of the Company or its employees physical or mental integrity (for example: threat to the safety of another employee, moral harassment, sexual harassment, discrimination, insider trading, conflict of interests, disclosure of a manufacturing secret, serious environmental breaches or threats to public health, serious risks to the Company's information system security...) contact your supervisor. You may not feel comfortable in using the normal channels. In that case, you may elect to call or write to the Compliance Officer. The reporting individual's identity will be kept confidential at all stages of the process and not disclosed to third parties such as the incriminated person and the reporting individual's supervisor, unless it is legally required to disclose such identity. Concerns regarding the Company's accounting, internal control or auditing matters may also be submitted (anonymously or not) to the Company's Audit Committee by mail via an envelope marked "CONFIDENTIAL" addressed to the attention of the AptarGroup Audit Committee Chairman, Leo Guthart, Topspin Partners, L.P., Three Expressway Plaza, Roslyn Heights, NY 11577. However, with respect to anonymous reporting, please note that if you do not tell us who you are, it may be more difficult for us to look into the matter. We therefore do not encourage anonymous reporting.

Reporting of concerns to either the Compliance Officer or the Audit Committee is hereafter referred to as the "Whistleblowing System". The use of this Whistleblowing System is entirely voluntary. Therefore, failure to make reports using the Whistleblowing System will not result in any sanctions.

No employee will be penalized for making a good-faith report of violations of this Code of Business Conduct and Ethics or other illegal or unethical conduct, nor will we

tolerate retaliation of any kind against anyone who makes a good-faith report. An employee, officer or director who submits a false report of a violation, however, may be subject to disciplinary sanctions in accordance to the relevant laws and regulations. If you report a violation and in some way also are involved in the violation, the fact that you reported the violation will be taken into consideration.

The Compliance Officer or Audit Committee, where applicable, will investigate all reports of violations. You should not investigate on your own but leave such work to the appropriate persons chosen by the Compliance Officer or the Audit Committee. If the result of an investigation indicates that corrective action is required, the Company or Audit Committee will decide what steps to take, including, when appropriate, legal proceedings and disciplinary procedure, which may lead to sanctions in accordance with the applicable laws and regulations, up to and including termination, to rectify the problem and avoid the likelihood of its recurrence.

You are entitled to access to personal data about you that may be collected in connection with this Whistleblowing System and to rectification or deletion if the data are found to be inaccurate, incomplete, ambiguous or outdated. You are also entitled to object on legitimate grounds to the holding of such data. If you wish to exercise any of these rights, you should contact the Compliance Officer.

You understand and approve and agree that your personal data will be collected and processed for the purpose of the Whistleblowing System and in the scope as required for the identification and investigation of potentially non-compliant behavior. Your personal data can be transferred to all authorized recipients, including AptarGroup's Compliance Officer, Audit Committee Members and other individuals necessary for any investigation. These recipients may be located outside the European Economic Area and the recipient's country may have different privacy laws and protections than your country. In this case, appropriate data transfer agreements have been or will be entered into in order to protect your personal data.

XI. RELATIONSHIP TO COMPLIANCE MANUAL

This Code of Business Conduct and Ethics does not supersede, change, alter or replace the existing policies and procedures already in place as stated in the Compliance Manual. Certain policies referred to herein are contained in their entirety in the Compliance Manual, and employees, officers and directors are instructed to refer to the Compliance Manual for a copy of those policies and required reporting procedures. The Compliance Manual contains information that is proprietary and confidential, and AptarGroup hereby expressly denies waiving any right to assert claims that the contents of the Compliance Manual are proprietary and/or confidential.

This Code of Business Conduct and Ethics and the Compliance Manual are statements of goals and expectations for individual and business conduct. They are not intended to, and do not in any way constitute, an employment contract or an assurance of continued employment. AptarGroup does not create any contractual rights by issuing this Code of Business Conduct and Ethics or the Compliance Manual.

XII. AMENDMENT, MODIFICATION AND WAIVER

This Code of Business Conduct and Ethics may be amended, modified or waived by the Board of Directors of the Company or the Audit Committee of the Board of Directors of the Company. Any change to, or waiver of, this Code of Business Conduct and Ethics for executive officers or directors must be disclosed promptly to our stockholders either by filing a Form 8-K with the Securities and Exchange Commission or by publishing a statement on our website.

XIII. ACKNOWLEDGMENT

Employees, officers and directors are accountable for knowing and abiding by these policies. The Company requires executive officers, directors and certain employees to sign an acknowledgment confirming that they have received and read this Code of Business Conduct and Ethics, understand it and are complying with it.

A copy of this Code of Business Conduct and Ethics may be found on the Company's website.

Approved: January 2015