



## Anti Bribery Policy

It is the policy of ESC PACKAGING LIMITED to conduct business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever or whoever we operate and trade with. This policy applies to all personnel that are employed in any capacity with us.

### Definition of a Bribe

A bribe is a financial or other advantage offered or given:

To anyone to persuade them to or reward them for performing their duties improperly or;

To any public official with the intention of influencing the official in the performance of his duties.

### Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must notify The Company Directors if they feel that a gift or hospitality was given or received to enact improper influence.

### Facilitation Payments and Kickbacks

ESC Packaging Limited does not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

### Donations

We do not make contributions of any kind to political parties. No charitable donations or gifts will be made for the purpose of gaining any commercial advantage.

### Record Keeping

Appropriate records are maintained and independently audited by 3rd parties to ensure correct financial compliance. Additionally, all expense claims by ESC Packaging Limited personnel are appropriately documented.

### Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken

Mrs Carri-Anne Walker  
Managing Director



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