



Business Code of Conduct Policy

Our Business Conduct and Trading Policy defines the standards that ESC Packaging Limited (ESC) upholds in all of its operations – both external and internal. It is our policy to always deal with all stakeholders honestly, responsibly and with integrity, free from fraud or deception.

Compliance with our code helps to sustain and enhance the good reputation of the Company and contributes to long term trust and confidence with all stakeholders. The protection of this reputation is of fundamental importance. In recognition of this importance our core values and approaches to business are set out clearly as a set of principles, rules and expectations. All employees are expected to abide by them, along with people acting on our behalf.

Customers

- ESC aims to provide products which deliver value and quality.
- We will not give deliberately inadequate or misleading descriptions of products or services.
- We will not knowingly sell products which will harm the public.
- Our reputation for honesty, truthfulness, fairness, service and decency is the foundation upon which our relationship with our customers is based.
- In relation to the Bribery Act 2010 ESC's position is that bribing or offering to bribe another person is not permitted and specifically any foreign public official. Employees must not give any gift of significance to a customer. Nor may any gift for services be given which could be construed as being intended as a bribe. This does not include normal corporate hospitality which must be within financial limits established by ESC.
- ESC will maintain the confidentiality of all customer information.

Suppliers

- All suppliers are entitled to fair treatment and every potential supplier should be given a reasonable opportunity to obtain our business on a regular basis. Our established suppliers will not be replaced without an appropriate level of benefit being generated for ESC.
- ESC aims to seek and develop a relationship of mutual trust with its suppliers.
- The purchasing power of ESC will never be used unscrupulously. Suppliers will be paid in accordance with the agreed terms of trade.
- Employees must never allow their independence to be compromised by a supplier. The receipt of gifts or favours by employees may give rise to a conflict of interest between what is good for ESC, and that of the employee.
- The following principles should be observed: -
Reasonable small tokens and hospitality may be accepted provided that they do not place the recipient under any obligations, are not capable of being misconstrued, and are within financial limits established by ESC.

Gifts or favours must not be solicited
Gifts of money must never be accepted

Any offers of gifts or favours of unusual size or for a questionable purpose should be reported to line management as soon as possible.

In relation to the Bribery Act 2010 ESC's position is that requesting, agreeing to receive or accepting a bribe is not permitted.



- Employees must record and notify personal transactions with those suppliers where there is a discretionary element to their appointment.
- All information about ourselves and a supplier is strictly confidential.

Employees

• ESC operates a framework of fair and just remuneration policies and structures in recognition of the efforts of the individual in helping to maintain the success of the company. In return ESC expects loyalty and commitment from all employees.

- ESC is a member of Living Wage and ensures all employees are paid at least the Living Wage.

The continuing success of ESC depends on the abilities of our employees in developing the business. ESC will, therefore encourage and assist employees at all levels to develop relevant skills and progress their careers within ESC free from any discrimination or bias.

- No employees should discriminate against another member of staff, contractor, supplier, or customer, regardless of race, colour, sex, marital status, disability, age, gender reassignment, pregnancy and maternity, religion or belief, or sexual orientation. In all matters ESC gives full and fair consideration to all employees and potential employees.
- ESC is committed to providing staff with appropriate information on financial, economic and other matters of concern through training courses, briefings, circulars, newsletters, handbooks and annual reports. Employees are consulted directly about changes designed to improve the effectiveness of their working unit.
- ESC seeks to provide clean, healthy and safe working environments at least in line with industry best practice. Employees for their part have a responsibility to take every reasonable precaution to avoid injury to themselves, their colleagues and members of the public.
- Any personal interest of an employee, or a close family member of the employee, in a supplier is required to be disclosed. In addition, any hospitality received from suppliers must also be disclosed. Provided you do not ask for a gift and as long as it does not influence, or have the appearance of influencing, your objectivity or decision-making, you are not required to disclose the acceptance of gifts with a low monetary value such as corporate give-aways, consumables or other items with a perceived value of less than £25, known as Allowable Gifts. However, gifts with a financial value perceived to be in excess of £25 should be disclosed. This creates an environment of openness and transparency in our dealings with suppliers and should ensure that conflicts of interest do not arise.
- ESC will not tolerate any sexual, physical or mental harassment of its employees. It is the duty of all employees to ensure that their actions at no time contribute to the creation of an intimidating or offensive work environment.
- Information received by employees in the course of their work will not be used for any purpose except that for which it was given. Employees should also ensure that they act within the confines of the Data Protection Act and other relevant legislation.

Investors

- ESC will comply with all relevant legislation, Accounting Standards, and health and safety and environmental regulations and communicate its business policies, achievements and prospects honestly.
- ESC will seek to protect the interests of shareholders and will not advantage one class of investor at the expense of another.



Local Community and Government Relations

- ESC is concerned with conserving and improving the environment in its broadest sense. ESC has issued an Environmental Policy Statement, which sets out both ESC's and the employee's responsibilities for the environment. All employees are expected to support ESC in achieving its environmental objectives.
- ESC respects its position within the communities in which it operates. It serves those communities by providing goods and services efficiently and profitably, and by providing good employment conditions and opportunities.
- Senior Management at ESC may decide to make charitable donations and educational and cultural contributions.
- ESC will not knowingly evade tax obligations and will record and report all transactions, according to the law.

Competitors

- ESC will not attempt to acquire improperly a competitor's trade secrets or other confidential information. This includes industrial espionage, hiring competitors' employees specifically to obtain such information or any other approach which is not honest and transparent.
- Our competitive success is founded upon our own abilities. We have, therefore, no need to disparage our competitors directly or by implication or innuendo. ESC competes fiercely and honestly.
- Employees will avoid discussing proprietary or confidential information during any discussions with competitors.
- Key employees will be provided with training of the Code and asked to confirm their adherence to it.
- ESC will aim to create an appropriate mechanism that enables employees to raise concerns about behaviour or decisions that they consider to be against this Code. Employees should discuss their concerns with local line management initially. Strict adherence to the provisions of this Code is expected of all employees.
- Alternatively, a confidential reporting facility is available by writing to the Managing Director. All matters raised in this way will be investigated independently and tactfully.

Mrs Carri-Anne Walker
Managing Director



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