

**Ethical Policy of**  
**Emballator (UK) Limited**

**Unit 1 and 2, City Link Industrial Estate**  
**Phoenix Way**  
**Bradford**  
**West Yorkshire**  
**BD4 8JP**

*and*

**Unit 3 and 4, Whitehead Business Park**  
**Holland Street**  
**Bradford**  
**West Yorkshire**  
**BD4 8BH**

**Dated 30<sup>th</sup> November 2021**

**Revision 07**

### Policy:

It is the policy of Emballator (UK) Limited to comply with the relevant legal provisions and associated ETI Base Code.

### Introduction:

Our policy has been derived from the group's shared core values- "Sustainable values – The Herenco way"- and it is based on the laws, regulations, and applicable ordinance- the Ethical Trading Initiative (ETI) Base Code which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

The group's Code of Conduct can be found via the link below:

[https://www.emballator.com/wp-content/uploads/2021/03/Herenco\\_Uppforandekod\\_EN\\_webb.pdf](https://www.emballator.com/wp-content/uploads/2021/03/Herenco_Uppforandekod_EN_webb.pdf)

The Ethical policy focuses on nine key areas as follows:

1. Employment is freely chosen.
2. Freedom of association and the right to collective bargaining are respected.
3. Working conditions are safe and hygienic.
4. Child labour is not used.
5. Living wages are paid.
6. Working hours are not excessive.
7. No discrimination is practised.
8. Regular employment is provided.
9. No harsh or inhumane treatment is allowed.

Our ethical policy has been established to set standards and provide guidelines regarding the way Emballator UK Ltd should operate in Ethical matters. It is important to retain this set of core values and approaches.

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### Responsibilities

Philip Mann, Managing Director has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations and also is responsible for investigating allegations of the policy breaches in the Company's business or supply chains.

Violet Fedorovic, HR Manager has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal policies and procedures to ensure they are effective.

### Employees

Emballator UK Ltd values its Employees as a key resource. An atmosphere of good employee communication, involvement & responsibility as both individuals and as a team is of central importance. The personal development and optimum use of Employee talent are strongly encouraged, and every employee has an equal opportunity for personal recognition and career development, regardless of personal background or belief. No form of discrimination or harassment will be tolerated. An important part of this policy is recruiting, selecting, rewarding, and promoting people who demonstrate entrepreneurial behaviour and show individual initiative in combination with a high degree of knowledge and experience of our products, markets and culture.

### Customers

Everybody must play their part in providing quality and efficiency to customers. Emballator UK Ltd believes that integrity in dealings with customers is a prerequisite for a successful and sustained business relationship. Personal contact, helpful and responsive action are features of the service we provide to develop long term relations with our customers. Emballator UK Ltd is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices about the services they purchase.

### Suppliers

Emballator UK Ltd will aim to develop relationships with our suppliers based on mutual trust and all dealings will be always conducted in a professional manner. We also undertake to pay our suppliers on time and according to agreed terms. Emballator UK Ltd is committed to monitoring social standards in the supply chain, and as far as it is reasonably practicable, encourages suppliers to operate within the same ethical standards.

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### Community

Emballator UK Ltd will comply with all legislation affecting its operations. We will seek to serve and support the community in which it operates by providing services efficiently and profitably, and by providing good employment opportunities and conditions. We will consider the concerns of the wider community including both national and local interests.

## Human Rights

All employees are treated with dignity and respect with equal employment opportunities given to all irrespective of their race, religion, gender, sexual orientation, maternity, marital status, family status, disability, age, or national origin. Employees are offered a safe and healthy workplace and the company will not tolerate any form of harassment. Emballator UK Ltd is committed to the prevention of any violation of established Human Rights of any kind and it does not itself and does not use suppliers who use child labour or any other labour which is in breach of the basic principles of the International Labour Organisation.

## Health & Safety

Emballator UK Ltd is committed to providing a safe and healthy working environment for all of its employees. Emballator UK Ltd. commits, where it is reasonably practicable, to:

- Prevent the injury and cases of work-related ill-health.
- Promote standards of health, safety, and welfare that complies with the provisions and requirements of the Health and Safety at Work etc. Act 1974 and all other statutory provisions and codes of practice.
- Provide and maintain safe and healthy workplaces and working environments, safe systems and methods of work and protect employees and others who may be affected by work operations.
- Provide employees with the information, training, and supervision that they need to work safely and efficiently and to develop safety awareness.
- Continuously develop and improve the Company's health and safety program through proactive and reactive management.
- Define all individuals' responsibilities for health and safety matters.
- Encourage full and effective joint consultation and participation of employees across all business levels on all health and safety issues.

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### The Environment

Emballator UK Ltd Promotions is concerned with the conservation of the environment in its broadest sense and recognises that certain resources are finite and must be used responsibly. We will, therefore:

- Work with others toward a consensus on environmental standards which are desirable and attainable.
- Aim to improve all aspects of the business in respect of environmental issues.
- Pay particular attention to environmental issues including the conservation of energy and natural resources, the control of noise levels, recycling of waste material and the utilisation of non-polluting technology.

### Social Responsibility

Emballator UK Ltd is committed to and encourages collaboration with organisations that support Fair Trade and operate non-exploitative employment practices in their businesses and supply chains throughout the world. It will conversely not invest in or do business with any organisation that:

- manufactures or designs weapons, instruments of warfare or torture, or that derives significant revenue from weapons-related products or services; or
- manufactures tobacco products or derives significant revenue from tobacco-related products.

### Conflict of interest

This policy does not allow bribery, commissions, payments, kickbacks, gifts of substantial value, excessive entertainment, bribes or political contributions and requires employees to seek to avoid conflicts of interest and to disclose any that do exist. Employees must ensure that their actions are not affected by conflicts of interest.

### Information

Emballator UK Ltd regards information for the purpose of its business as a corporate asset that must be protected against loss of availability, infringement and improper disclosure. We seek to ensure as far as reasonably practicable, that this information is protected. This applies also to intellectual property including inventions, trade secrets, technical information, product design, production expertise, customers' information etc.

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### Records

Honesty, completeness and accuracy of records are vital. Records of transactions should be maintained in an accurate, complete, transparent and timely manner in accordance with accounting principles. No unrecorded funds or assets should be established or maintained.

#### Emballator UK Ltd:

- promotes a culture of ethical behaviour throughout the organisation.
- sets clear standards for employees.
- makes good business sense.
- protects the integrity and enhances our reputation.
- supports the principles of good corporate governance.