



CODE of BUSINESS INTEGRITY

INTRODUCTION

The Management Team have drawn up this Code of Business Integrity which sets out the businesses core ethical and environmental standards for its employees and suppliers at all levels.

This Code describes the policies, processes and procedures which are in place and which we expect suppliers to accept for identifying fraudulent business practices and protecting those who report their concerns.

COMPLIANCE WITH THE LAW

Warden Plastics Ltd is fully committed to acting professionally, fairly, legally and with integrity in all our business dealings and relationships and to upholding all laws and applicable regulations in all jurisdictions in which we operate. The Board of Directors routinely reviews this Code and its related policies and procedures, recording findings and taking actions to make changes.

BRIBERY POLICY

Warden Plastics will uphold all laws relevant to countering bribery and corruption. We remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

The Policy applies to all employees, suppliers, customers, contractors, consultants, agencies and public officials working in any capacity with or for the Company.

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in an honest, ethical and socially responsible manner. We take a zero-tolerance approach to bribery and corruption.

Business and Financial Records

Warden Plastics keeps financial records in accordance with fiscal regulations and have appropriate internal controls in place which are audited regularly by third parties and will evidence the business reasons for making payments to third parties.

Conflict of Interest

The Company accepts that members of its staff engage in a wide variety of external activities. On occasion, however, they may give rise to conflicts of interest, whether potential or actual, perceived or alleged.

A financial conflict of interest, for the purposes of this Code, is one where there is or appears to be opportunity for personal financial gain (or gain to relatives or friends) or where it might be reasonable for another party to take the view that financial benefits might affect that person's actions.

Procedure

Employees must not engage in any form of bribery, either directly or indirectly, through any third party (such as a supplier or customer). Employees must not offer, give or receive any gift or hospitality which could be regarded as illegal or improper.

The prevention, detection and reporting of bribery and other forms of corruption or fraud are the responsibility of all those working for us or under our control.

The Company wishes to empower all individuals and organisations covered by this Policy to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

Protection

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The Company are committed to ensuring no one suffers any detrimental treatment because of refusing to take part in bribery or corruption, or because of reporting their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

The Company 'Whistleblowing Policy' details the complete procedures under which concerns can be raised.

Issues are able to be reported to our independent helpline available 24hrs a day 7 days a week on 0800 988 6818.

HUMAN RIGHTS

We follow and expect our suppliers to conduct their activities in a manner that respects human rights as set out in The United Nations Universal Declaration of Human Rights.

Equality and Diversity

At Warden Plastics, we treat each other with respect and dignity. We actively create and promote an environment that is inclusive of all people and their unique abilities, strengths and differences, and we promote diversity as a strategic and competitive business advantage for the company.

We respect diversity in each other, our customers and suppliers and all others with whom we interact.

Equal Opportunities

The Company acknowledges its legal and moral obligation both in recruitment and in employment to offer equal opportunities to all persons irrespective of race, disability, sex, sexual orientation, gender, age, marital status, religion or similar belief.

It is contrary to our legal and moral duties to discriminate against any person on the grounds of any of those matters in respect of his or her terms and conditions of employment and opportunities for training and promotion. We are committed to extending protection from discrimination to all groups.

Positive Work Environment

The Company is committed to creating a harmonious working environment, which is free from harassment and bullying and in which every employee is treated with respect and dignity.

It is committed to ensuring that individuals do not feel apprehensive because of their race, disability, sex, sexual orientation, gender, age, marital status, religion or similar belief. Harassment and bullying are unacceptable behaviour at work and will be treated as misconduct.

Modern Slavery

The Company is committed to ensuring that there is no slavery or human trafficking in its own business and its supply chains which is set out in a Modern Slavery Statement as required by the Modern Slavery Act 2015. The organisation reviews and evaluates existing suppliers and undertakes due diligence when considering new suppliers.

Working Time Regulations

The Company recognises that compliance with the Working Time Directive Regulations (1998) and National Minimum Wage Regulations (1999), is an important health and safety related issue and all Company employees, temporary or agency workers, and those on work experience are subject to the regulations and there is no voluntary opt out at Warden Plastics. The company will audit hours worked to ensure that employees are working within these regulations.

HEALTH & SAFETY

The Company is committed to providing all employees and workers with a safe & hygienic working environment (see Health & Safety Policy).

The Company will:

- Provide and maintain safe and healthy working conditions.
- Maintain procedures for reporting and investigating accidents.
- Make regular equipment safety inspections.
- Initiate schemes to encourage interest in safety.
- Provide basic safety training for all personnel and specialised training for each job function.

ENVIRONMENTAL PROTECTION

Warden Plastics Ltd is committed to minimising the impact of its activities on the environment and to promoting sustainability within its own operations and those of our suppliers. We ensure compliance with all laws and regulations by completing a legal register. We work to continuously take measures to improve on the environmental impact of our products and facilities.

DATA PROTECTION

The Company is aware of and complies with the provisions of the Data Protection Act 2018 which is concerned with the processing and use of personal data and the requirements are communicated to and acknowledged by employees through the Employee Handbook. This includes taking security measures to guard against unauthorised access to, alteration, accidental loss, disclosure or destruction of data.

Furthermore, employees must comply with policies for the authorised and to prevent unauthorised use of e-mail and the internet.

Where employees are involved in financial transactions with customers or clients, we ensure that they are aware of and comply fully with the Company's procedures which meet the Payment Card Industry Data Security Standard (PCI DSS) to decrease payment card fraud and increase payment card data security.

The Company is aware of and taking measures to comply with the General Data Protection Regulating which come into force in May 2018.

COMMUNICATION and RESPONSIBILITY

This Code must be communicated to and acknowledged by all employees and relevant organisations.

Responsibility for implementing, communicating and updating this Code lies with the Management Board and is reviewed at least annually.

Further information can be accessed from the following policies and procedures: -

- Bribery Policy
- Whistleblowing Policy
- Code of Conduct
- Health & Safety Policy
- Quality Policy
- Environmental Policy
- Sustainability Policy
- Discipline and Grievance Policy
- Modern Slavery Statement
- Company Employee Handbook