



# **CLIFFE PACKAGING LTD**

## **Business Ethics Policy**

### **Issue No: 1.0**

**Created Date: 12/12/2023**  
**Contact Officer: Matt Dawber (QHSE Manager)**  
**Latest Revision: 12/12/2023 (1.0)**  
**Review Date: 12/12/2025**

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## 1.0 Introduction

### 1.1 Purpose

Cliffe Packaging Ltd is one of the UK's leading suppliers of industrial packaging with a supply chain including countries around the globe. Cliffe Packaging is committed to ensuring its representatives conduct business in the most ethical manner possible and operates a zero-tolerance approach to fraud, corruption and bribery. The business actively takes steps to ensure its representatives act honestly and with integrity, following all laws and regulations and always protecting the business.

This policy forms part of the demonstrable commitment Cliffe Packaging makes to ensuring its operations are free from unethical behaviour and to set objectives and measures for its prevention. Along with the Employee Code of Conduct, this policy also provides business representatives with guidance on the standard of behaviour the business expects.

Following the implementation of our Employee Code of Conduct, this higher-level policy replaces our previous anti-bribery policy.

### 1.2 Scope

The scope of this policy includes all directors, managers, employees, or any other persons representing Cliffe Packaging Ltd.

## 2.0 Objectives

Cliffe Packaging is committed to the following objectives:

- Comply with all local and international laws and regulations regarding fraud, corruption and bribery.
- Maintain measures to ensure our representatives to not give or receive gifts which may be considered bribes.
- Provide representatives with tools to identify warning signs of bribery and corruption.
- Ensure confidentiality of data during and after a period of employment, including information from any organisations within our value chain.
- Maintain measures to ensure the business remains free from acts of money laundering.
- Communicate acts defined under anti-competition and provide guidance to employees on how to prevent scenarios which may be judged as anti-competitive behaviour.
- Provide employees and interested parties with a way in which they can report any witnessing of wrongdoing relating to unethical conduct.
- Ensure **100%** of employees complete the anti-bribery awareness training presentation.
- Have an annual **zero** incident rate for reports of unethical conduct of any kind.

## 3.0 Controls and Measures

Employees are issued with an Employee Code of Conduct and Employee Handbook at the commencement of employment or whenever updates are issued. This provides detailed instructions and procedures on instances of gift receipt, for example, to ensure that it does not constitute a bribe.

## 4.0 Whistleblowing Procedure

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#### 4.1 Contact Details

If any interested party needs to report a violation, please contact one of our directors directly using the following details. If you wish for your report to be anonymous, please call from a withheld number or complete a website enquiry marked for the directors' attention, omitting personal details.

Name	Telephone	Email
Philip Dawber	+44 (0) 1782 987099	phildawber@cliffepackaging.com
David Dawber	+44 (0) 1263 863101	daviddawber@cliffepackaging.com

#### 4.2 Confidentiality Guarantee

Every report we receive is treated with the strictest confidentiality, treated with equal priority and dealt with promptly. If a resulting investigation is required, this is conducted thoroughly and as confidentially as possible.

#### 4.3 No Tolerance for Retaliation

Reporting violations and concerns is a requirement of our code of conduct and way of working, so it is imperative anybody feels comfortable in doing so. We do not tolerate any form of retaliation against anyone who makes a report in good faith or whose input is required in an investigation.

#### 5.0 Review and Approval

The QHSE Manager has been appointed to oversee the implementation of this policy and identifying best practices and tools that the Cliffe Packaging can use to help achieve its commitment to a zero-tolerance approach to bribery, corruption and fraud.

This policy is reviewed at least once annually by the board of directors with guidance from the QHSE Manager, is communicated internally and is made available publicly to all interested parties upon request.

Signed: 

Date: 12/12/2023

Philip Dawber

Managing Director