

CODE OF CONDUCT & ETHICS FOR ASSOCIATED & THIRD PARTIES

LOCAL AND FOREIGN LAWS: Neither you, nor anyone acting on your behalf, may directly or indirectly break or seek to evade the laws or regulations of any country in, through or with which we seek to do business. That an illegal act is a “customary business practice” in any country is not sufficient justification for violation of this provision.

BRIBERY AND CORRUPTION: Neither you, nor anyone acting on your behalf, may directly or indirectly offer or provide a bribe, and all demands for bribes must be expressly rejected.

Bribery includes any offer, promise, or gift of any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political party, political candidate or party official or any private sector employee, in order that the official or employee act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or business advantage.

Neither you, nor anyone acting on your behalf, shall offer or make facilitation payments to government officials in order to encourage them to expedite a routine government task that they are otherwise required to undertake. You shall have discretion to deviate from this prohibition only if the government action sought is an urgent matter concerning health and safety. While it may be recognised that extortion in some areas is widespread, participation by the business community increases demand for facilitation payments.

KICK-BACKS: Neither you, nor anyone acting on your behalf, may “kick-back” any portion of a contract payment to employees of other parties to a contract or use other vehicles such as subcontracts, purchase orders or consulting agreements to channel payments to government officials, political candidates, employees of other parties to a contract, their relatives or business associates.

A “kickback” is a particular form of bribe which takes place when a person entrusted by an employer or public function has some responsibility for the granting of a benefit and does so in a way that secures a return (kickback) of some of the value of that transaction or benefit for that person without the knowledge or authorisation of the employer or public body to which the person is accountable.

ANTI-TRUST & COMPETITION: You will comply with all applicable competition and anti-trust laws and regulations and you are strictly prohibited from engaging in any conduct or activity that breaches these laws.

CONFLICTS OF INTEREST: you, and those acting on your behalf, shall avoid any relationship or activity that might impair, or appear to impair, your ability to render objective and appropriate business decisions in the performance of your job.

POLITICAL CONTRIBUTIONS: Neither you, nor anyone acting on your behalf, may make a political contribution in order to obtain an unlawful business advantage. You shall comply with all public disclosure requirements.

PHILANTHROPIC CONTRIBUTIONS: You, and those acting on your behalf, may make contributions only for *bona fide* charitable purposes and only where permitted by the laws of the country in which the contribution is made. Contributions made in order to obtain an unlawful business advantage are prohibited.

EXTORTION: You, and anyone acting on your behalf, shall reject any direct or indirect request by a public official, political party, party official, or private sector employee for undue pecuniary or other advantage, to act or refrain from acting in relation to his or her duties.

GIFTS, HOSPITALITY AND ENTERTAINMENT: You, and those acting on your behalf, shall avoid the offer or receipt of gifts, meals, entertainment, hospitality or payment of expenses whenever these could materially affect the outcome of business transactions, are not reasonable and *bona fide* expenditures, or are in violation of the laws of the country of the recipient.

COMMUNICATIONS AND TRAINING: You agree to participate in anti-corruption training provided by CCL Secure or companies engaged by CCL Secure.

TRUST AND COLLABORATION: You, and those acting on your behalf are committed to providing a work environment in which employees and persons who enter the workplace environment are treated fairly and with respect. You and those acting on your behalf recognise that everybody has the right to be treated with respect and dignity. CCL Secure recognises the right of all of its employees and workplace participants to work in an environment that is free from all forms of harassment and also expects all contractors and consultants to provide such a working environment.

WHISTLEBLOWER: CCL Secure is committed to fostering a culture of good corporate governance and ethical behaviour. CCL Secure believes that the best way of maintaining this culture is through a working environment in which officers, employees and contractors of CCL Secure are able to report instances of unacceptable conduct without fear of victimisation or reprisal.

To this end, CCL Secure has implemented a Whistleblower process to ensure that there is a mechanism for reporting unacceptable conduct, compliance, risk or significant issue identified and that they are appropriately managed and that such Whistleblowers are protected.

CCL Secure has an established Whistleblower Protection Policy which encourages staff and anyone with business dealings with our company to be alert for any behaviour or occurrence that seems inappropriate or illegal. To report in total anonymity, any internal or external stakeholder can contact [Expolink](#) free from any country 7 days a week, 24 hours a day via phone, internet, email or post.

Further details are also available on CCL Secure’s website at www.cclsecure.com.

Method of Contact	Australia	United Kingdom	Mexico
Telephone	1800 121 889	0800 374 199	01 800 123 0193
Internet/ email	http://expolink.co.uk/whistleblowing/submit-a-report/		
Post	Expolink Europe Ltd 6 Greenways Business Park Bellinger Close Chippenham SN15 1BN United Kingdom		

You are expected to adopt and comply with the CCL Secure’s Code of Conduct and Ethics. If you fail to observe the terms of the CCL Secure’s Code of Conduct and Ethics, this may expose individuals to civil or criminal proceedings.