



CCL SECURE'S COMMITMENT TO INTEGRITY AND ETHICAL BEHAVIOUR

We have an absolute commitment to operate to the highest standards of integrity and ethical behaviour. It is our ambition to be the role model others in our industry look to.

This commitment is founded on our core belief that profitable business, ethical behaviour and high integrity are all compatible and mutually supportive goals.

Every CCL Secure director, employee, contractor, business partner and third party representative we employ is required to:

- Behave with integrity in all matters.
- Fully and consistently comply with all local laws and regulations wherever we operate.
- Compete fairly & vigorously for business with full regard for the laws that promote competition.
- Never provide gifts, payments or other inducements in order to influence the actions of another person or entity.
- Never solicit or accept any form of bribe or anything that could be construed as a bribe.
- Report all matters involving an actual, potential or suspected breach of CCL Secure's Integrity & Ethics policy.
- Uphold the highest personal ethical standards in all matters including the use of company resources, honest and accurate reporting and the treatment of other people.
- At all times behave without the use of harassment, intimidation or discrimination.

Supervisors and managers must take all reasonable steps to ensure that the people for whom they are responsible are aware of and uphold the behaviours described in the internal document "CCL Secure's Conduct and Ethics – In Practice". This includes:

- Consistently demonstrating exemplary behaviour.
- Undertaking activities to foster a culture in which employees understand their responsibilities and feel comfortable about raising concerns without fear of retaliation.
- Making certain that mandatory Company policies, standards and procedures are accessible and understood.
- Responding promptly and seriously to employees' legitimate concerns and questions about business conduct issues and seeking further assistance if required.
- Establishing internal processes that address risk areas in relation to business conduct and ensuring that actual or potential breaches are appropriately investigated and handled.
- Encourage the reporting of all business conduct breaches to a Legal & Risk representative or Senior Management Group member or through the Whistleblower process.
- Taking or recommending appropriate actions to address business conduct issues.

If you are in doubt about what to do or whether to speak up, ask yourself some simple questions:

The values test:

Does it fit with CCL Secure's values?

The law test:

Is it legal and in line with our Policies & Standards?

The conscience test:

Does it fit with my personal values?

The newspaper test:

If the story appeared in the paper, would I feel comfortable with the decision?

The family test:

What would I tell my partner, parent or child to do?

The 'feel' test:

What's my intuition or 'gut feel'? If it 'feels' bad, then it probably is bad!

Failing any of the above tests indicates that you need to talk with someone about the concern you have.

We do not consider these obligations to be negotiable.

They are the foundation of our long term success and our right to operate.