

• 5.15 Business Ethics Policy

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1. Our Vision and Values:

Our principles are aligned with best practice in corporate responsibility. We conduct our business responsibly and in compliance with the laws and regulations of all the countries where we do business. The company does not tolerate illegal and unethical behavior.

'Our Business Principles govern the manner in which we at AESSEAL conduct ourselves. They have been set by the Group and are a requirement placed upon each individual operating company. We apply these principles across the Group, they are subject to regular review and comment upon them is encouraged.'

Chris Rea
Group Managing Director

2. Economic:

We recognise the importance of delivering long-term, sustainable shareholder value. We need a strong financial base to fulfil our social and environmental responsibilities and the sustainability and continuity of our business.

3. Business Integrity:

- a) Our commitment to business integrity is clear and unequivocal; dishonest practices distort markets and waste resources
- b) We condemn corrupt and fraudulent practices and require transparency, integrity and honesty in all aspects of our business
- c) AESSEAL companies and our employees and agents are prohibited from offering, condoning or authorising payments, gifts or inducements to any person for the purposes of securing any improper business or other advantage
- d) This principle applies to both direct and indirect activities and relationships
- e) We do not, directly or indirectly, solicit or accept any gift, payment or other advantage from any person or organisation in return for providing any improper business or other advantage
- f) AESSEAL recognises that facilitation payments are prohibited under the anti-bribery laws of most countries and complies with all relevant law
- g) In countries where such payments are not prohibited by law and form part of the business culture they remain unacceptable to AESSEAL and our team members are instructed not to participate in them but to report any such event to their line manager for further action
- h) Our team members are permitted to offer and accept entertainment and hospitality in the course of business provided that it is modest, does not exceed reasonable local business practice and is permissible under all applicable laws
- i) Such acceptance is not permitted where it may be perceived as having a material impact on any business transaction, could break any applicable law or where it may not comply with our other business integrity principles
- j) No undisclosed or unrecorded account, fund or asset shall be established or maintained by any person or organisation
- k) Full and proper records shall be kept of all transactions involving the company. Supporting documents shall be readily available, genuine and shall accurately describe the nature of any transactions undertaken

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- l) All of our team members must act with honesty and integrity and avoid actual and apparent conflicts of interest in personal and professional relationships

4. Business Partners:

- a) We seek mutually beneficial relationships with our business partners and clients.
- b) The ability to comply with these business principles effectively will be the dominant factor in determining whether we can enter into, or remain within, such relationships.
- c) Any breach of the AESSEAL Business Integrity principles, as laid out within this document, by a Business Partner will lead to a review and probable termination of such a relationship.
- d) AESSEAL team members who find evidence of such activities - business partners that compromise our Business Principles - must report such evidence to their line manager in a timely fashion for further action.

