

Ebi (Easibind International Limited) – Business Code of Conduct

Ebi (Easibind International Limited) is committed to a policy of delivering product that has been manufactured and sourced in an ethically responsible manner. As an organisation that sources raw materials from both the UK and Global markets, it is important that our business partners adhere to the parameters and controls we put in place that minimise the impact of their business activity on the local environment and protects the welfare of those employed by them.

SCOPE

- This Code of Conduct applies to all Ebi (Easibind International Limited) own premises and in particular to all staff that have a managerial or supervisory responsibility for employees.
- All business partners, including suppliers, service providers, subcontractors and labour providers are also required to adhere to the standards set out in this Code of Conduct and must comply with, sign and return this Code of Conduct together with any supporting documents for approval status.
- All employees have the right and the responsibility to resolve doubts or uncertainties about ethical questions and should, in the first instance, contact their manager for guidance prior to taking any action. An 'open door' policy is encouraged throughout our business so that, if necessary, such queries can be brought to the attention of higher levels of management.
- Specific concerns can also be raised without fear of discrimination by using our whistleblowing policy.
- The provisions of this Code constitute minimum and not maximum standards, and this Code should not be used to prevent business partners from exceeding these standards. Business partners applying this Code are expected to comply with national and other applicable law and, where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection.

CODE

This Code of Conduct is based on the Ethical Trading Initiative (ETI) base code, the Fundamental Conventions of the International Labour Organisation (ILO), and national and international laws.

1. Employment is freely chosen

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge monetary deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.
- 1.3 Jobseekers must not be charged, either directly or indirectly, in whole or in part, any fees or costs at any point in the recruitment or employment process.

2. Freedom of association, the right to collective bargaining are respected and access to remedy

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder the development of parallel means for independent and free association and bargaining.
- 2.5 Workers shall be provided with appropriate and effective access to remedy in accordance with natural justice and without fear of detriment.

3. Working conditions are safe and hygienic

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.

- 3.2 Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable the causes of hazards inherent in the working environments.
- 3.3 Workers shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers.
- 3.4 Workers shall be provided with access to clean toilet facilities and to potable water, and, if appropriate sanitary facilities for food storage shall be provided.
- 3.5 Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.
- 3.6 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

4. Child labour shall not be used

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend quality education until no longer a child; “child” and “child labour” being defined in the appendices.
- 4.3 Young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures relating to Child Labour shall conform to the provisions of the relevant International Labour Organisation (ILO) Standards.

5. Wages

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal or industry benchmark standards, whichever is higher. In any event wages shall always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions including information with respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions defined in the clauses below, whichever affords the greater protection for workers.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay, except where a consolidated rate of pay has been negotiated with worker representation.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by the clause below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
 - 6.5.1 this is allowed by national law.
 - 6.5.2 this is allowed by a collective agreement freely negotiated with a workers’ organisation representing a significant portion of the workforce.
 - 6.5.3 appropriate safeguards are taken to protect the workers’ health and safety; and

6.5.4 the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

7. No discrimination is practised

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

7.2 All employees are entitled to fair treatment by others, and to be treated with respect and dignity. In return, they are expected to treat others in this way.

7.3 It is our policy to offer explicit and fair terms of employment and to provide employees with appropriate opportunities to develop their skills and progress in their careers. It is our intention to honour all applicable terms and conditions of employment.

7.4 We consider that the diversity of our workforce is a strength to the business. All employees regardless of any protected characteristic (age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race (including nationality, ethnic or national origin) will be treated equally, with fairness, honesty, respect and dignity. Harassment (including sexual, physical, mental, use of abusive language or offensive gestures) or bullying, in any shape or form will not be tolerated. Any employee who is found to have acted in a discriminatory manner or to have behaved in a way which indicates bullying or harassment will be subject to disciplinary action and all employees are strongly encouraged to report such incidents.

8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

10. Entitlement to work

10.1 Only workers with a legal right to work in the country should be employed.

10.2 For all workers, original documents should be reviewed and then returned to workers to verify right to work.

11. Supply chain due diligence

11.1 Businesses shall demonstrate sound commercial procurement practices, prior to appointment, to establish that suppliers, subcontractors, service providers, labour providers and homeworkers operate in line with all required legal and ethical labour standards. In particular, for labour providers ensuring that:

11.1.1 Relationships with Labour providers are covered by a contract and Service Level Agreement which meets all national legal and ethical requirements.

11.1.2 Labour providers undergo an independent, third-party social compliance audit on a regular basis to ensure compliance with all legal and ethical requirements.

12. Business Management

12.1 Businesses will operate to well developed and integrated ethical labour standards policies and procedures as stipulated in this Ethical Labour Standards Policy. In particular:

- 12.1.1 Ensuring an anti-bribery and corruption policy is in place, is constructed in accordance with globally accepted good practice and is applied and complied with in arrangements with potential and current suppliers, service providers and clients.
- 12.1.2 Ensuring key decision-making managers act at all times in a fit and proper manner.
- 12.1.3 Ensuring the requirements of this Code are disseminate to your own suppliers and that you have trained your own high-risk staff such as purchasing and logistics on business ethics to avoid the potential for bribery and corruption within the supply chain.
- 12.1.4 Ensuring that the business has the competence, capability and management processes to enable it to comply with all applicable legislation and ethical standards related to the recruitment and employment of workers.
- 12.2 Suppliers must guarantee that the full range of products, services and works delivered into Ebi Easibind do not breach any intellectual property or copyright laws.
- 12.3 If you are certified to any International Accreditation Forum (IAF) recognised Quality, Health and Safety or Information Security Management Standard (e.g. ISO 9001, BS OHSAS 18001, ISO 45001 or ISO 27001) for the full range of products, services and works you provide, you must supply the latest copy of your certificate(s) with this signed agreement.
- 12.4 Suppliers must have business continuity arrangements in place or be certified to a recognised Business Continuity Standard (e.g. ISO 22301) for the full range of products, services and works you deliver into Ebi Easibind, please provide evidence of your business continuity arrangements or the latest copy of your certificate with this signed agreement.
- 12.5 All suppliers of chemicals, substances and materials (articles) into Ebi Easibind must supply safety data sheets with mandatory labelling requirements in digital format.

13. Money laundering

- 13.1 Money laundering is the process or scheme by which both the identity of "dirty money" or money representing the proceeds of crime (which may include proceeds of drug trafficking, white collar crime, tax evasion etc) and the true ownership of those proceeds is changed, so that the money appears to come from a legitimate or lawful source. In many instances, the money representing the proceeds of crime will pass through a number of financial centres and entities in an effort to disguise the source of the money.
- 13.2 It is an offence to assist in money laundering, to fail to report knowledge or suspicion of money laundering, or to prejudice an investigation by tipping off or informing the person who is the subject of a suspicious report. Any employee or worker who is suspicious of, or has knowledge of, any activity which may involve money laundering should speak to their manager.

14. Financial procedures and fraud prevention

- 14.1 We encourage all employees to maintain integrity and honesty in all financial transactions. We consider any illegal or unethical financial practices to be unacceptable.
- 14.2 We all share responsibility for preventing crime at work. If any individual becomes aware that a crime is planned or may have been committed, they are encouraged to advise their manager immediately.
- 14.3 Employees should not sign any document unless it has been checked thoroughly by someone with the appropriate authority to do so.
- 14.4 Any suspicious activity will be investigated. Fraud and theft will be regarded as gross misconduct.
- 14.5 Any fraudulent activities will be dealt with in accordance with our disciplinary policy. Such activities may include (but are not restricted to): falsification of personal information (e.g. qualifications); falsification of timesheets, work activity records, expense claims etc; attempts to forge any documentation.

15. Tax

15.1 Businesses shall ensure that all employment and business taxes are accurately calculated and paid in accordance with national law.

16. Bribery

16.1 A bribe includes any payment, benefit, or gift offered or given with the purpose of influencing a decision or outcome. The payment may not be of large value and it could be as simple as a lunch or, for example, an invitation to a sporting event. We are each responsible for knowing what our business guidance allows and what the law permits regarding gifts and benefits given to or received from clients, customers, suppliers or other third parties. Guidance and approval should always be obtained from a manager before accepting or giving any gift or entertainment.

16.2 It is our policy to comply with all laws, rules and regulations designed to prevent bribery and corruption. Under UK law, bribery and corruption is punishable for individuals by up to ten years' imprisonment, and if the business is found to have failed to prevent bribery or taken part in corruption it could face an unlimited fine, be excluded from tendering for Government contracts and face significant damage to its reputation.

16.3 We, or any of our employees, will not offer, give or receive bribes or inducements of any sort for any purpose. The payment, or offer, of bribes, or the provision of or offer of gifts or anything of value or other advantage for improper purposes to obtain or retain business or any other benefit (whether for the business or any other party) is prohibited. Such payments or gifts may result in immediate dismissal for those involved in their payment or receipt.

16.4 We recognise that over and above the commission of any crime, any involvement in bribery will also reflect adversely on our image and reputation. Our aim therefore is to limit any exposure to bribery by,

- setting out a clear anti-bribery stance.
- training all employees to recognise and avoid the use of bribery by themselves and others.
- encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution.
- taking firm and vigorous action against any individual(s) involved in bribery.

16.5 In addition, we are required to keep financial records and to have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

16.6 We all share in a responsibility to prevent bribery and if employees are aware or suspect that bribery is taking place or has taken place, they have a duty to report this.

17. Confidentiality

17.1 The nature of our business means that employees may be exposed to sensitive and confidential information.

17.2 All employees have a responsibility to protect all confidential and sensitive information relating to the business as well as that of our customers.

17.3 Employees should take steps to ensure that confidential information regarding previous, current or prospective employees, workers, business associates, clients/customers and suppliers is protected. Information concerning our business activities should not be disclosed to unauthorised persons whether internal or external. Confidential information should be clearly marked as such. Under no circumstances should such information be disclosed to third parties including the media. This obligation continues when an employee leaves the business. The only exception is if the information is in the public domain.

17.4 Confidential information, including personal data or files should not be left unattended on desks or tables and should be locked away when away from the workstation. Personal data must not be disclosed to other employees unless it is required for their work. Any requests for personal information, either in writing or on the telephone (e.g. from the police, HMRC or any other body) must be referred to the relevant person.

- 17.5 All computer produced output and manual records must be securely disposed of. Anyone based off-site must shred any information they hold which is no longer required.
- 17.6 Access passwords or other security information should not be disclosed to anyone unless they are authorised to have this information.
- 17.7 Employees must not use such information obtained in the course of their employment for their personal gain or benefit, nor should they pass it on to others who might use it in such a way.

18. Environment

- 18.1 At a minimum, companies must comply with the requirements of all local and international environmental laws and regulations including having necessary permits.
- 18.2 The Registration, Evaluation, Authorisation & restriction of Chemicals (REACH) regulation governs the production, use and importation of chemical substances and therefore all suppliers of chemicals, substances and materials (articles) into Ebi Easibind must ensure they are REACH compliant. Ensuring all supplied articles do not contain any Substances of Very High Concern (SVHC) or substances intended to be released from the articles during normal or reasonably foreseeable conditions of use. You must provide your REACH Compliance Statement with this signed agreement.
- 18.3 As the regulations of REACH evolve, all suppliers will continue to monitor new requirements and take appropriate actions to inform Ebi Easibind of any changes to the supply of their articles, as found on the updated SVHC list.
- 18.4 If you are certified to any International Accreditation Forum (IAF) recognised Environmental Management Standard (e.g. ISO 14001, FSC or PEFC) for the full range of products, services and works you provide, you must supply the latest copy of your certificate(s) with this signed agreement.
- 18.5 If you have been subject to any legal proceedings or enforcement action from the local authority or other regulatory body in relation to any environmental breach, you must provide a copy of the incident report or supporting documentation with this signed agreement.
- 18.6 All contractors and waste removal companies must ensure they comply with the Waste (England and Wales) Regulations 2011 and any applicable local legislation or other requirements. You must provide the latest copy of your Certificate of Registration with this signed agreement.

ACCOUNTABILITIES AND RESPONSIBILITIES

This Code has been approved by Ebi (Easibind International Limited) Senior Management Team and will be reviewed annually. The Policy Owner is the Finance Director who is responsible for creating this Code and ensuring there are appropriate systems in place to manage compliance with the Code of Conduct, all relevant legislation, and maintaining records to monitor and demonstrate compliance.

IMPLEMENTATION AND MONITORING

- **Internal:** Ebi (Easibind International Limited) will implement supporting management systems to ensure this Code is embedded throughout the business. We will undertake regular, internal audits and set necessary targets and objectives to monitor and measure our own progress on ethical compliance. We will undergo regular independent audits, commissioned by our customers, to monitor our own compliance with this Code.
- **Labour providers:** We expect labour providers to undergo an annual, independent third-party social audit or equivalent external scrutiny through an independent, labour provider social compliance certification scheme.
- **Suppliers, Service providers and Sub-contractors:** We expect all suppliers, service providers, sub-contractors and any other business partners to agree as part of their contract to adhere to the standards set out in this Code of Conduct and to all relevant legislation and international labour standards. Where necessary, we may request further evidence of compliance to these standards for example through an independent, third party social compliance audit.

COMMUNICATION AND GRIEVANCE MECHANISMS

- This Code is available to view on our website www.ebiuk.com. We are committed to communicating to all relevant parties internally and externally, with appropriate training where necessary, all updates to this Code.
- Details of how workers may raise grievances in relation to this Code or on any other matter related to Ebi (Easibind International Limited) conduct are detailed in our Employee Handbook.

DEFINITIONS

- **Child** - Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If, however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply.
- **Homeworker** - Our definition of homework is based upon the ILO definition (1996, C177, Article 1) which states:
 - a) the term homework means work carried out by a person, to be referred to as a homeworker,
 - i) in his or her home or in other premises of his or her choice, other than the workplace of the employer.
 - ii) for remuneration.
 - iii) which results in a product or service as specified by the employer, irrespective of who provides the equipment, materials or other inputs used, unless this person has the degree of autonomy and of economic independence necessary to be considered an independent worker under national laws, regulations or court decisions;
 - b) persons with employee status do not become homeworkers within the meaning of this Convention simply by occasionally performing their work as employees at home, rather than at their usual workplaces.
 - c) the term employer means a person, natural or legal, who, either directly or through an intermediary, whether or not intermediaries are provided for in national legislation, gives out homework in pursuance of his or her business activity.
- **Labour provider** - A term interchangeable with "labour recruiter" as expressed in the Forced Labour (Supplementary Measures) Recommendation, No. 203, which refers to both private and public entities that offer labour recruitment services. Private entities may be formal (e.g. registered under commercial or other law) or informal (not registered, such as informal sub-agents), profit-seeking (e.g. fee-charging agencies) or non-profit.

Labour providers operating as private entities are defined by ILO Convention No. 181 Article. 1.1 as private employment agencies as "a natural or legal person, independent of the public authorities, which provides one or more of the following labour market services:

 - a) services for matching offers of and applications for employment, without the private employment agency becoming a party to the employment relationships that may arise therefrom.
 - b) services consisting of employing workers with a view to making them available to a third party, who may be a natural or legal person (referred to below as a "user enterprise") that assigns their tasks and supervises the execution of these tasks.
 - c) other services relating to job-seeking, determined by the competent authority after consulting the most representative employers and workers organizations, such as the provision of information, that do not set out to match specific offers of and applications for employment."

A labour provider may be referred to by various terms including but not limited to labour broker, labour recruiter, gang-master, employment business, private employment agency, recruitment agency or agency.
- **Young worker** - Any worker over the age of a child as defined above and under the age of 18.

Signed:



Dean Bailey - Finance Director, Ebi (Easibind International Limited) – 12th February 2020

SIGNED AGREEMENT

This section is to be completed by all business partners, including suppliers, service providers, subcontractors and labour providers. It must be returned to Ebi (Easibind International Limited) for business partner approval status.

“I *Sign here* have read Ebi (Easibind International Limited)’s Business Code of Conduct and I confirm that this company, practices its business activities in compliance with this Code of Conduct.”

Name:

Position (Senior Manager):

Company:

Date:

If applicable, please send the following requested information with this signed agreement;

Requested documents	Yes	No
Your Company Registration and VAT numbers		
Copies of any independent third-party Ethical audit reports or Labour provider audit reports		
ISO 9001 certificate		
BS OHSAS 18001 or ISO 45001 certificate		
ISO 27001 certificate		
Evidence of your business continuity arrangements or ISO 22301 certificate		
Guarantee that the products or services supplied do not breach any intellectual property or copyright laws		
REACH Compliance Statement		
ISO 14001 certificate		
Incident report or supporting documents for any environmental breach		
Certificate of Registration under the Waste (England and Wales) Regulations 2011		
FSC and / or PEFC certificate		
Heavy Metals Statement in compliance with the Packaging and Packaging Waste Directive 94/62/EC		
Conflict Minerals Policy Statement		
Policy Statement on Sustainability		
Take-back and Recycling Policy Statement		
Up to date Safety Data Sheets for chemicals, substances and materials (articles) supplied		

DOCUMENT REVISION AND APPROVAL

Rev.	Date	Nature of Changes	Approved By
01	15/06/2018	Original issue.	Dean Bailey
02	30/01/2019	14 Environment - Inclusion of Ebi Easibind Environmental requirements. Signed agreement - Inclusion of the required information to be returned.	Dean Bailey
03	02/10/2019	Requested documents – Additions of Company Registration and VAT numbers & Copies of any independent third-party Ethical audit reports or Labour provider audit reports.	Dean Bailey
04	12/11/2019	Amends to Scope for employees' rights, and Section 7. No discrimination is practised. Additions of new sections - 13. Money laundering, 14. Financial procedures and fraud prevention, 16. Bribery, and 17. Confidentiality.	Dean Bailey
05	12/02/2020	12 Business Management - Addition of '12.1.3 Ensuring the requirements of this Code are disseminate to your own suppliers and that you have trained your own high-risk staff such as purchasing and logistics on business ethics to avoid the potential for bribery and corruption within the supply chain.'	Dean Bailey