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## **1. COMMITMENT**

Volcke Aerosol is committed to the sustainable development of its business. We aim to achieve positive economic performance through ensuring the health and welfare of our people and by demonstrating environmental, social and ethical responsibility. We will use this Code of Conduct as both a standard and a benchmark for how we conduct our working and business relationships.

## **2. SCOPE**

Our Code of Conduct applies to each employee and director within Volcke Aerosol. It also extends to our suppliers, service providers and other business partners, who are expected to endorse the content or share a comparable formal commitment of their own.

## **3. VALUES**

We endeavor to conduct ourselves and our relationships with stakeholders and partners in a professional and courteous manner.

As a family company we believe that our people make the difference. Our slogan is “Good People are the Mark of a Good Company”. Our over-riding concern is the health, safety and welfare of our employees and the sustainability of our business:

Our key values are:

- Transparent - - - Honest, listen, trust, open communication, humble
- Together - - - Win-win, partnership, yes we can, collaboration, teamwork
- Solver - - - Keep it simple, positive-minded, flexible, passionate, accountable
- Respect - - - Helpful, tolerant, empathetic, ethical, sustainable

These values guide the way we work and form the basis of our Code of Conduct.

## **4. LEGAL COMPLIANCE**

Volcke Aerosol will comply with the aerosol industry regulations and all applicable national laws and regulations, with particular regard to :-

- The Environment;
- Human Rights, Labour Standards and Working Conditions
- Business Ethics
- Data Protection

## **5. THE ENVIRONMENT**

Our company believes that the environment is a heritage to be safeguarded in the interest of all and future generations, recognising the high value of environmental protection towards its sustainable development.

We will:-

- Maintain an Environmental Policy to guide our environmental actions and performance.

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- Contribute to protect human health and the environment by meeting applicable regulatory requirements including those covering: air emissions, solid/hazardous waste and water discharge.
- Adopt reasonable measures to mitigate negative operational impacts on the environment and strive to continuously improve environmental performance.
- Monitor and control waste streams, ensure that disposals are handled by registered and competent third parties.
- Promote the use of renewable and recyclable materials

## **6. HUMAN RIGHTS, LABOUR STANDARDS & WORKING CONDITIONS**

Volcke Aerosol fully supports the principles enshrined in the [Universal Declaration of Human Rights](#) and the [UN Guiding Principles on Business and Human Rights](#). For Labour Standards we benchmark against the [Ethical Trading Initiative \(ETI\) Base Code](#) founded on the conventions of the International Labour Organisation (ILO).

### **6.1. Human Rights**

- Support and respect the protection of human rights within our control as detailed in the Universal Declaration of Human Rights

### **6.2. Harassment – Respect & Dignity**

- Volcke Aerosol will treat their employees with respect and dignity and operate an anti-harassment policy.
- Our people will understand the different forms in which harassment exists. Physical, sexual, psychological, verbal harassment or other abusive conduct will not be tolerated.

### **6.3. Forced or Compulsory Labour**

- No form of forced labour shall be used.
- We will comply with all international/national laws related to slavery and human trafficking.

### **6.4. Child Labour**

- No use of child labour.
- Local child labour laws are fully respected and where there are no laws, the child labour age and any ‘young worker’ restrictions will apply.

### **6.5. Freedom of Choice**

- Employees are free to leave their employment after having given notice and working any notice period.
- Employees cannot be forced to work by any means.

### **6.6. Freedom of Association**

- To the extent permitted by the laws of the manufacturing country, Volcke Aerosol shall respect the right of their employees to freedom of association and collective bargaining. This includes the right to form and join trade unions and other worker organizations of their own choosing without discrimination or harassment.

### **6.7. Non-Discrimination**

- Volcke Aerosol supports equality, celebrates diversity and believes people are entitled to equal opportunity in employment.
- No distinction or discrimination between employees regarding hiring, salary, benefits, advancement, discipline, termination and others; on the basis of gender, race, religion,

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age, disability, sexual orientation, nationality, marital status, political opinion, trade union affiliation, social or ethnic origin, or any other status protected by country law.

## 6.8. Compensation

- Fully comply with all applicable remuneration, working hours and other benefits requirements.
- Employees will be paid promptly and earn at least the minimum wage required by country law and any legally mandated benefits such as holiday entitlements and statutory severance when employment ends.
- Practices such as training, apprenticeship wages, pre-employment fees, deposits or others that effectively lower an employee's pay below the legal minimum wage are not permitted.
- Overtime working is consensual and conditions are clearly detailed in a written Contract of Employment.

## 6.9. Working Conditions

- Volcke Aerosol will ensure compliance with all legislation related to Health and Safety in the workplace.
- Our H&S policy and procedures will ensure effective Management Systems at each site including:-
  - Promote and facilitate safe working practices.
  - Measure and continually improve safety performance.
  - Reduce work related illness and injury.
  - Comprehensive programme of safety risk assessments.
  - Personal Protective equipment (PPE)
  - First Aid support and equipment.
  - Health and Safety Committee and periodic safety training for all employees
- We will provide a clean, safe, and secure working environment.
  - Good Lighting, heating, and ventilation.
  - Access to clean drinking water, hygienic storage for foodstuffs, sanitary and washing facilities.

## 7. BUSINESS ETHICS

Volcke Aerosol will hold itself to the highest standards in relation to business ethics. We want to be honest, reliable, fair and trustworthy people to work with. To this end we expect our business partners to reciprocate this approach.

### 7.1. Anti-Bribery and Anti-Corruption

- Respect and comply with anti-corruption laws, directives and regulations in the countries we do business.
- Respect obligations to avoid unethical financial and non-financial actions in our business relations.
- Respect an anti- bribery policy based on the following definition:-
  - ‘the offering or accepting of any gift, loan, payment, reward or a business advantage for a personal, group or business gain, as an encouragement to do something which is dishonest, illegal or a breach of trust’.

- Volcke Aerosol expects its employees, suppliers, and customers to comply with and support this policy completely.

## **7.2. Fraud and Deception**

- We undertake not to seek to benefit in anyway through fraud, deception or forgery or by allowing a third part to act in such a way on our behalf.

## **7.3. Anti-Trust and Anti-Competition**

- Volcke Aerosol will fully respect and comply with anti-trust and fair competition laws, directives and regulations.

## **7.4. Conflicts of Interest**

- Volcke Aerosol will strive to avoid any conflicts of interest between the Company on one hand, and personal, professional and business interests on the other. This will include actual conflicts of interest as well as the perception of a conflict of interest.
- If a conflict of interest arises, employees, directors, stakeholders, business partners or others are expected to notify the company.

## **7.5. Gifts and Gestures of Goodwill**

Volcke Aerosol develops its business relationships at all levels based on the highest levels of trust, integrity and respect. We will never seek to influence or expect to be influenced by offers of gifts or gestures of goodwill:

- No employee or director of Volcke Aerosol will give or receive any form of payment or remuneration to a third party.
- Only gifts, hospitality or perks offered to an employee or director with the aim of maintaining good business relations or enhancing brand image may be accepted. The value must be strictly nominal.
- Any gifts or hospitality offered must be permitted by local law and regulation.
- Employees who are in doubt following an offer of gift or hospitality must seek guidance from their line manager, director or HR.

## **7.6. Whistleblowing**

It is important to Volcke Aerosol that any misconduct or wrongdoing by employees, directors or other agents is reported and properly addressed.

All employees and stakeholders are encouraged to notify the Company of any practice or action that they reasonably believe is against the public interest (see Whistle-blowing Policy).

This may include a practice or actions which is:

- a criminal offence
  - a failure to comply with any legal obligation
  - a miscarriage of justice
  - a danger to the health and safety of any individual
  - that the environment is being, or is likely to be, damaged
  - an attempt to conceal information on any of the above
- Employees raising legitimate concerns under this policy will not be subject to any detriment, either during or after employment.
  - The Company will also endeavor to ensure that the individual is protected from any intimidation or harassment by any other parties.

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- Similarly, no employee may in any way victimize or subject to any detriment, another employee on the grounds that they have made a disclosure under this policy. Any employee who does so may be subject to disciplinary action up to and including dismissal for gross misconduct.

## **8. DATA PROTECTION**

Volcke Aerosol respects the privacy rights of its people and comply with all applicable laws and regulations regarding the collection, processing and use of personal data.

### **8.1. Confidential Information**

- No employee entrusted with confidential information about Volcke Aerosol, Customers, Suppliers and other business partners may share that information with third parties or use the information for their own benefit.
- Sharing of confidential information may only be made following strict authorisation.

### **8.2. Data Privacy**

- Volcke Aerosol will comply with the General Data Protection Regulation and any other applicable local regulations.

### **8.3. Data Security**

- Our information systems will be protected by appropriate Cyber Security measures.
- Data is owned by the company and should be treated as company property and not shared outside of its intended use within the business.
- Employees are prohibited from copying or transferring company data onto non-company devices or onto data-sticks etc. without authorization.

The effectiveness and applicability of this Code of Conduct will be reviewed every two years.

We will invite our suppliers and business partners as appropriate to endorse the principles of this policy.

G. Ricketts  
Sustainability Officer

Date: May 19<sup>th</sup> 2023

#### Reference Documents

\*Universal Declaration of Human Rights

Ten Principles of the United Nations Global Compact

\*The Guiding Principles on Business and Human Rights

Children's Rights and Business Principles

The Ethical Trading Initiative Base Code