



Synergy Plastics Ltd (SPL), Social & Ethical Policy ensures that the company undertakes its activities in a socially, ethically and environmentally responsible manner. This includes the ethical treatment of employees, customers, associates, contractors, suppliers, stakeholders and the public. The policy extends beyond the companies direct dealings with people to include the social impact of its activities.

The Main Board Director responsible for the implementation of this Policy is John Batt, Managing Director

The Policy objectives are regularly reviewed and are supported by a number of other specific policies and procedures, which are regularly audited.

### **Policy Objectives:**

#### **Corporate**

Synergy Plastics Ltd is committed to the principles of good corporate governance and to ensuring that its business is properly directed and managed for the benefit of its stakeholders, including its managers and employees.

The company believes in honesty, integrity and professionalism in all aspects of its business. The company is committed to the development of Quality Management Systems throughout its business, as recognized by its ISO 9001, 2015 Accreditation.

#### **Social Policy**

SPL policy on social responsibility is designed to provide and promote opportunities for its employees and to reflect our involvement in the local communities in which we operate.

#### **Diversity and Equal opportunities**

SPL is committed to a policy of diversity and equal opportunities in its employment practices and fully supports the right of all employees to work in an environment which is free of sexual or racial discrimination or of bias related to any disability. The policy aims to ensure that there is no discrimination (either direct or indirect) against employees or applicants on the basis of sex, marital status, sexual orientation, race, ethnic origin, religion, religious beliefs, age or disability. SPL recognises the problems that harassment can cause in the workplace and considers harassment of any employee for any reason as unacceptable.

An environment where equality exists will lead to better performance from all of our employees who will feel that they can fulfil their own potential in an atmosphere free of discrimination. All employees have a personal responsibility for the practical application of equal opportunities in



their everyday dealings and working relationships with colleagues, customers, suppliers, and other appropriate parties.

SPL external stakeholders are diverse and come from all sections of the population. The structure of the workforce needs to reflect this diversity to enhance out interaction with the community.

**Equal opportunities means:**

- Encouraging and promoting talented employees regardless of their sex, race or disability.
- Ensuring that all employees have the same access to available opportunities for training and career development.
- Ensuring that fair and consistent criteria based on skills and abilities relevant to the job are used for recruitment/selection, performance management, training/development and promotion.

**Harassment and Victimisation**

SPL will not tolerate any form of victimisation or sexual or racial harassment.

Sexual and racial harassment are both forms of unlawful discrimination. They are characterised by unwanted conduct of a sexual or racial nature or abuse which is offensive to the recipient. Sexual harassment does not refer to behaviour which is mutually acceptable; it refers to behaviour which is personally offensive, which fails to respect the rights of others and is such that it could interfere with an individual's performance and approach to work. This can include unwelcome physical, verbal or non-verbal conduct.

Victimisation (or bullying) involves intentional intimidation or belittling of an individual. SPL policy is to make every effort to provide a working environment free from sexual/racial discrimination, intimidation and bullying.

All employees need to think about their own behaviour and that of their colleagues and reflect on whether it might be unacceptable or offensive. Managers have a responsibility to ensure that any form of harassment does not take place at the workplace and this includes ensuring that a culture of unacceptable behaviour is not allowed to develop.

**Ethical policy**

In all the company's operations it is important to retain a set of core values and approaches to the process of doing business. The company recognises its obligations to all those with whom it has dealings. The reputation of the company and the trust and confidence of those with whom it deals are among its most vital resources, and the protection of these is of fundamental importance. The company demands and maintains high ethical standards in carrying out its business activities. Corrupt practices will not be tolerated.



## **Relations with Customers / Anti bribery and corruption**

The company believes that integrity in dealings with customers is a prerequisite for a successful and sustained business relationship. This principle governs all aspects of the company's approach to its customers.

No employee may give money or any gift of significant value to a customer. Nor may any gift or service be given which could be construed as being intended as a bribe.

The company accords the same degree of confidentiality to confidential customer information as it does its own confidential information.

## **Relations with Suppliers**

The company aims to develop relationships with its suppliers based on mutual trust.

The company undertakes to pay its suppliers according to agreed terms of trade.

The receipt of gifts or favours by employees can give rise to embarrassing situations and may be seen as an improper inducement to grant some concession in return to the donor. The following principles should be observed:

- a) gifts or favours must not be solicited;
- b) gifts of money must never be accepted;
- c) reasonable small tokens and hospitality may be accepted provided they do not place the recipient under any obligation, are not capable of being misconstrued and can be reciprocated at the same level, and the employee's immediate superior is made aware of the same.

Any offer of gifts or favours of unusual size or questionable purpose should be reported immediately to the employee's superior and the Company Secretary.

**All suppliers & their subcontract operations must conform to the following rules based on the ETI (ethical trading initiative) an International recognised code of labour practice.**

### **1. Employment is freely chosen**

1.1 There is no forced, bonded or involuntary prison labour.



1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

## **2. Freedom of association and the right to collective bargaining are respected**

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.

## **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. 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 environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.



3.5 The company observing the code shall assign responsibility for health and 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 programs which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

#### **5. Living wages are paid**

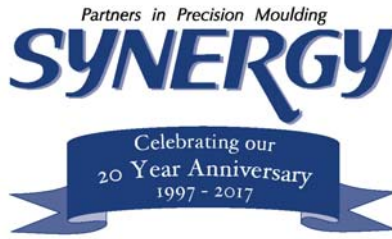
5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that 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 comply with national laws and benchmark industry standards, whichever affords greater protection.



6.2 In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

## **7. No discrimination is practiced**

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.

## **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.

## **Relations with Competitors**

The company will compete vigorously, but honestly.

In any contacts with competitors, employees will avoid discussing proprietary or confidential information.



The company believes service excellence to be the best way of enhancing its reputation.

Whilst fair comparison between the company's strengths and competitors' weaknesses may be made, the company will not engage in damaging competitors' reputations either directly or by implication, misrepresentation or innuendo.

#### Issues relating to International Business

The company will respect the traditions and cultures of each country in which it operates.

The company commits itself to obey the laws of countries and communities where it conducts business. Where business practices differ in countries in which the company operates, it will favour consistent procedures among subsidiaries and associates. It will work for multilateral action aimed at achieving a high common standard.