

Ethical Code of Conduct Policy Statement

Compliance with Laws and Regulations

Suppliers are required to abide by all applicable laws, codes or regulations including, but not limited to, any local or national legislation regarding wages and benefits, compensation, working hours, equal opportunity, worker and product safety. Spicers also expects that Suppliers will conform their practices to the published standards for their industry as well as relevant ILO (International Labour Standards).

Employment Practices

Working Hours & Conditions: In compliance with applicable laws, regulations, codes and industry standards, Suppliers are expected to ensure that their employees have safe and healthy working conditions and reasonable daily and weekly work schedules. Employees should not be required to work more than the number of hours allowed for regular and overtime work periods under applicable local legislation.

Non-Discrimination: Suppliers should implement a policy to effectuate all applicable national and local legislation prohibiting discrimination in hiring and employment on the grounds of race, colour, religion, sex, age, disability, nationality or ethnic or national origin, pregnancy, gender reassignment, marital status, sexual orientation or any other basis prohibited by law.

Child Labour. Suppliers should only use workers that comply with local labour law and legislation for the type of work being performed in any facility in which the supplier is doing work for Spicers. In no event should suppliers use employees younger than 15 years of age.

Forced, bonded or involuntary prison labour. In accordance with applicable law, no Supplier should perform work or produce goods for Spicers using labour under any form of forced, bonded or involuntary prison labour, nor should threats of violence, physical punishment, confinement, or other form of physical, sexual, psychological, or verbal harassment or abuse be used as a method of discipline or control.

Pippa Maynard

Company Secretary, Spicer's U.K & Ireland.

6th March 2015