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# ESSENTRA

## ESSENTRA ETHICS CODE 2017

At Essentra, we are committed to doing business the right way to continually earn the trust of our customers, our other stakeholders and the wider marketplace. As we follow the three steps to long-term success of Stability, Strategy and Growth, our six principles should direct each of us in how we behave at all times in the workplace. Essentra's Ethics Code helps to ensure that everyone working for or on behalf of the Company understands our expectations and conducts Essentra business in a way that is consistent with these six principles and our procedures.

Each of us is expected to understand and embrace the principles of our Ethics Code and:

- Act responsibly, honestly and with integrity.
- Show respect, and treat others fairly and with dignity.
- Conduct our activities based on the highest ethical standards.
- Ensure our business practices comply with all legal or regulatory requirements.

Our Ethics Code is a framework to assist in making ethical decisions, and is supported by further policies and guidance notes. None of these documents can address every issue that an Essentra employee may face in the performance of their duties. However, together with common sense, logic and good faith behaviour, our Ethics Code provides a framework and structure to guide each of us in determining the correct course of action.

Essentra's Company Secretarial department is accountable for promoting, monitoring and enforcing our Ethics Code. However, responsibility for following the Ethics Code and for upholding Essentra's overall integrity and reputation – both globally and locally - rests with each of us individually.

### Standards of Ethical Business Conduct

#### 1) Health, Safety and Environment

Essentra is committed to providing a safe and healthy working environment for all employees, which avoids negatively impacting and causing injury or harm to the environment and to the communities in which the Company operates.

*Further reference:*

- *Environmental Policy*
- *Health & Safety Policy*

#### 2) Employees

Essentra is committed to providing a respectful and diverse working environment, and will not tolerate harassment in any form. The Company is guided by the aim of providing employees with the opportunity to develop and advance - subject to personal performance and business objectives – and remunerates fairly with respect to skills, performance, competitors and local market conditions.



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Essentra is committed to equal opportunities at work; employees should not engage in or support discrimination based on race, colour, language, caste, national or ethnic origin, indigenous status, sexual orientation, religion, disability, gender, marital status, union membership, political affiliation or age.

Throughout its international operations, Essentra supports human rights as set down by the United National Declaration and its applicable International Labour Organisation conventions. This includes a mandatory requirement on all sites to avoid the employment of children, as well as a commitment to the prevention of slavery and human trafficking.

*Further reference:*

- *Human Resources Policy*
- *Modern Slavery Policy*

### **3) Right to Speak**

Essentra's Right to Speak Policy and process is in place to enable any employee to report any circumstances where they genuinely and reasonably believe that the standards of the Ethics Code, or the Company's wider policies and guidance notes, are not being upheld. Essentra is committed to ensuring that employees feel able to raise any such concerns openly in good faith, without fear of victimisation or retaliation and with the support of the Company. Employees can access the Ethics Reporting Line via [essentra.ethicspoint.com](https://essentra.ethicspoint.com) to report any concerns on a confidential basis, or use the confidential individual Helpline telephone numbers which are displayed at each business location.

*Further reference:*

- *Right to Speak policy*

### **4) Compliance with laws, rules and regulations**

Essentra is committed to complying with both the letter and the spirit of the laws and regulations that govern its business. Employees must observe the applicable legislation for the country in which they operate, and guidance or specific legal advice should be sought when appropriate.

Employees who are involved in preparing any information that will be included in a public communication to investors, or in any document that will be filed with the London Stock Exchange or the UK Listing Authority, must ensure that such information is complete, accurate and timely.



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## 5) Conflict of Interests

Essentra is committed to ensuring that all employees avoid any activities that might lead to - or suggest - a conflict between their personal interest and the interests of the Company. This duty applies to the exploitation of any property, information or opportunity impacting (or potentially impacting) on the Company, and includes the acceptance of gifts or benefits which could be seen as providing personal gain at the expense of Essentra.

All employees are required to declare any conflict – or potential conflict – of interests, and to update any previous declarations which have become inaccurate or incomplete. The duty to avoid conflicts is not infringed if the conflict of interests has been declared and approved in advance.

*Further reference:*

- *Conflict of Interests Policy*
- *Anti-Bribery & Corruption Policy*
- *Gifts & Entertainment Policy*

## 6) Bribery and Corruption

Essentra does not engage in or tolerate any conduct which may constitute bribery or corruption, whether directly by an employee or indirectly through a third party (such as a family member or agent acting on the Company's behalf).

Essentra respects all anti-bribery and corruption legislation in the countries in which it operates, and employees are responsible for ensuring that their personal behaviour and business conduct complies with such requirements, particularly laws which relate to specific or local practices. Where necessary, the appropriate legal advice should be requested.

Essentra is committed to ensuring that third-party service providers acting on the Company's behalf carry out their business to the highest ethical standards, and avoid any conduct which may constitute bribery or corruption. Essentra prohibits the use of contracts or consulting agreements to channel improper payments through agents or other intermediaries to third parties, whether private or public.

Essentra will not authorise or be a party to any financial payment or benefits in kind, with the intention of inducing or rewarding any person to perform improperly a function or activity that they are otherwise expected to undertake in good faith, impartially or from a position of trust (eg, the award of a contract or an order).



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*Further reference:*

- *Anti-Bribery & Corruption Policy*
- *Conflict of Interests Policy*
- *Gifts & Entertainment Policy*
- *Agency Compliance Policy*
- *Third Party Due Diligence Policy*

## **7) Gifts and Entertainment**

Essentra is committed to ensuring that the acceptance or offering of gifts and entertainment is reasonable, appropriate and subject to managerial approval. All employees must ensure that they deal with customers, suppliers and other business relationships in a way that avoids their independent judgement on behalf of the Company being influenced by personal advantage – or any appearance that this may be the case.

*Further reference:*

- *Anti-Bribery & Corruption Policy*
- *Gifts & Entertainment Policy*
- *Conflict of Interests Policy*

## **8) Relationships with Customers and Suppliers**

Essentra is committed to dealing fairly with customers and suppliers, and to ensuring that its relationships are managed to the highest standards of ethical business practice and in accordance with all applicable anti-trust and trade laws and regulations.

Employees have a responsibility to ensure that all the Company's activities support the delivery of excellence in both products and service, and should not take unfair advantage of any third party through manipulation, concealment, abuse of privileged information or misrepresentation of material facts. In addition, employees shall ensure – as far as is reasonably practicable – that suppliers are not engaged in the employment of children contrary to United Nations Conventions.

*Further reference:*

- *Anti-Trust & Competition Law Policy*
- *Third Party Due Diligence Policy*
- *Modern Slavery Policy*

## **9) Confidential Information and Data Protection**

Essentra is committed to ensuring that confidential information is preserved and protected. Confidential information includes commercial details, personal data and trade secrets – among other items – and no employee shall access, modify, disclose (internally or externally) or make use of such information, unless they have the proper authority and the purpose for doing so is consistent with the legitimate execution of their duties. This obligation of confidentiality continues to apply after an employee has ceased working for Essentra.



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The Company is also committed to ensuring that its business practices and the behaviour of all employees comply with the requirements of all applicable data protection, security and privacy laws and regulations.

*Further reference:*

- *Confidential Information Policy*
- *Data Protection Policy*

## **10) Protection and Proper Use of Essentra Assets**

The Company's assets are the foundation from which Essentra provides its products and services worldwide, and employees are responsible for the protection and proper use of these assets. This includes establishing and complying with procedures that ensure that Essentra's assets are not put at risk or used wastefully.

Essentra is committed to ensuring that employees who access the internet and social media act with the highest standards of honesty, integrity and decency at all times. The Company does not tolerate any form of abuse arising from the use of e-mail or social media.

In all cases, employees should ensure that their use of Essentra's assets does not prejudice the Company's interests.

*Further reference:*

- *End User IT Usage Policy*
- *Anti-Bribery & Corruption Policy*

## **11) Books and Records**

The integrity of Essentra's books and records is essential. The Company is committed to ensuring that all receipts and expenditure are prepared and maintained with strict accuracy and completeness, supported by documents that properly describe all third-party dealings. The falsification of any book, record or account – including the submission of any false personal expense statement or claim for reimbursement of a non-business related expense – is prohibited.

Under no circumstance shall any accounts or payments be established or maintained "off book", and the storage or destruction of all books and records relating to Essentra's business activities must comply with Company procedure.

*Further reference:*

- *Document & Data Management and Retention Policy*



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## **12) Political and Charitable Contributions and Public Officials**

Essentra prohibits providing contributions, gifts or assistance to political parties, whether directly or indirectly. This includes any political fundraising activity by any candidate for / or holder of any state or local office (or an elected committee or similar association for such candidate) and / or political party of a state or locality.

Essentra also prohibits providing gifts or entertainment to any public official for the purpose of exerting any improper influence – or otherwise influencing their official or commercial actions – to gain a business advantage for the Company. Essentra does not prohibit making direct or indirect contributions to charities. However, caution should be exercised to ensure that charities are not being used as a cover for political purposes, or to channel improper payments to public officials / to other third parties for unethical purposes.

*Further reference:*

- *Anti-Bribery & Corruption Policy*
- *Gifts & Entertainment Policy*

### **Compliance with Essentra's Ethics Code**

All employees are required to comply with this Ethics Code, and are personally responsible for doing so. In addition, employees should ensure that third parties working with, or on behalf of, the Company are aware of the Ethics Code and, as appropriate, any relevant supporting policies or guidance notes. Wherever required by these policies or guidance notes – or whenever else it is appropriate – employees should seek contractual undertakings from third parties to act in accordance with Essentra's Ethics Code and any applicable policies or guidance notes. Employees must carry out appropriate due diligence and ongoing monitoring of third parties working with, or on behalf of, Essentra to ensure their compliance with these requirements and expectations.

Failure to observe the terms of the Company's Ethics Code – or any of the supporting policies and guidance notes – may result in an employee's conduct being subject to review. In the most serious cases, such review may potentially lead to the termination of their employment and / or result in personal criminal or civil liability.