



Corporate Social Responsibility and Ethics Policy

Incorporating Anti-Bribery And Corruption Policy

Ashford Colour Press recognises the responsibilities we have to our employees, customers, suppliers and the wider communities in which we live and work as well as the environment as a whole. We support, within our sphere of influence, a set of core values outlined in **The Ten Principles of the United Nations Global Compact**, the UN standard for responsible business in the areas of human rights, labour, the environment and anti-corruption.

Ashford Colour Press embraces these principles and will conduct its business within the guidelines of **The UN Global Compact's Ten Principles**. We are committed to maintaining our corporate social responsibility and we will work in conjunction with our staff, supply chain and interested parties to ensure the requirements of this Policy are fully implemented.

Health & Safety Policy Statement

Ashford Colour Press Ltd is dedicated to providing a safe and healthy environment for employees and customers, protecting the public and preserving our assets and property.

Our full Health and Safety policy statement sets out our general approach to health and safety and explains how we manage health and safety in our business.

Environmental Policy Statement

Ashford Colour Press Ltd is committed to the conservation and improvement of the environment and to minimising negative environmental impacts arising from its activities. The issues that are important for us to control are:

- Prevention of pollution
- Generation of waste
- Use of raw materials
- Nuisance (litter/paper dust etc)
- Use of Environmentally friendly products (Vegetable based inks and Chemicals)
- Comply with the FSC® (Forest Stewardship Council) Chain of Custody requirements and sourcing paper from sustainable sources and meeting Core Labour requirements

Our full Quality and Environmental policy statement confirms our aim to actively protect the environment.

Ten Principles of the UN Global Compact

Corporate sustainability starts with a company's value system and a principled approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. Responsible businesses enact the same values and principles wherever they have a presence and know that good practices in one area do not offset harm in another. By incorporating the Global Compact Principles into strategies, policies and procedures, and establishing a culture of integrity, companies are not only upholding their basic responsibilities to people and planet, but also setting the stage for long term success.

This policy is made available to relevant interested parties externally on our website and internally through training and awareness programmes.

The UN's Global compact's Ten Principles are derived from the Universal Declaration of Human Rights, The international Labour Organisations Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

Human Rights

Principle 1 - Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2 - make sure that they are not complicit in human rights abuses.

Labour

Principle 3 – Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4 – the elimination of all forms of forced and compulsory labour.

Principle 5 – the effective abolition of child labour.

Principle 6 – the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7 - business should support a precautionary approach to environmental challenges

Principle 8 - undertake initiatives to promote greater environmental responsibility and

Principle 9 - encourage the development and diffusion of environmentally friendly technologies

Anti-Corruption

Principle 10 – Businesses should work against corruption in all its forms, including extortion and bribery.

One of our core values is to uphold responsible and fair business practices. We are committed to promoting and maintaining the highest level of ethical standards in relation to all of our business activities. Our reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. In addition to adopting the 10 principles Ashford Colour Press Ltd are also committed to the Ethical Trading Initiative (ETI) Base Code:

ETI Base Code

- *Employment is freely chosen*
- *Freedom of association and the right to collective bargaining are respected*
- *Work conditions are safe and hygienic*
- *Child labour shall not be used*
- *Living wages are paid*
- *Working hours are not excessive*
- *No discrimination is practiced*
- *Regular employment is provided*
- *No harsh or inhumane treatment is allowed*

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Anti-Bribery And Corruption Policy

Ashford Colour Press Ltd has a zero tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships and implementing and enforcing effective systems to counter bribery.

The company will seek to comply with all international, national, and local legislation affecting its operations. It will strive to follow the best practice in corporate governance. It will meet its tax obligations. It will not make any financial contributions or offer support to any political party.

This document sets out the Company Policy in relation to anti-bribery and corruption matters. Compliance with this policy is regarded as part of contracts of employment. Failure of employees to follow the rules set out in this document may result in disciplinary action being taken which could result in dismissal.

Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of our business.

Corruption is the misuse of entrusted power for private gain.

To place this in context, engaging in activities which are contrary to UK anti-bribery and corruption legislation, means individuals could face up to 10 years in prison and/or an unlimited fine, and our Company could also be liable to an unlimited fine and Government sanction.

This policy document is not regarded as exhaustive, but does give specific examples of situations and sets out the rules and procedures and which should be followed. Ashford Colour Press Directors seek to ensure all staff understand that any fraudulent business practice is unacceptable and that any employee found to be involved in any kind of corrupt practice is likely to be immediately dismissed and may well have committed a criminal act which could lead to prosecution

If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from a Director.

You should at all times act in accordance with the following provisions:-

- Behave honestly, responsibly and with integrity - be trustworthy and set a good example;
- Safeguard and uphold the Ashford Colour Press core values by operating in an ethical, professional and lawful manner at all times.
- Use Company resources in the best interests of the Ashford Colour Press and do not misuse those resources;
- Make a clear distinction between the interests of the Ashford Colour Press and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to a Director immediately;
- Ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult a Director
- Confidentially report all incidents, risks and issues which are contrary to this policy document to a Director
- Raise any issues regarding anti-bribery and corruption laws and Company policies. Queries will be dealt with anonymously and a written response will be issued;
- Do not offer or accept bribes.
- Do not, without express prior written approval from a Director, offer or accept any gifts or hospitality to or from customers, contractors, suppliers, other third parties, or public officials.

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Gifts are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

Hospitality includes invitations to hosted meals, receptions and events for business purposes.

- Do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you are faced with a demand for a facilitation payment you must:
 1. Actively resist the payment;
 2. Inform a Director.

By complying with this policy document we aim to ensure that individual employees and Ashford Colour Press will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the Policy we can demonstrate that we have adequate procedures in place to prevent such activity.

You have an independent obligation to prevent bribery and corruption at Ashford Colour Press and to ensure that any interaction with public officials complies with this policy document and relevant laws.

Rob Hutcheson

R. Hutcheson

Managing Director

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