

Ford Packaging Systems Limited is the world leader in the manufacture of aluminium capping systems and supplies all of the leading filling machine manufacturers. We operate around the World and we pride ourselves on our reputation for acting fairly and ethically wherever we do business. Our reputation is built on our values as a company, the values of our employees and our collective commitment to acting with integrity throughout our organisation.

Ford Packaging Systems Limited condemns corruption in all its forms and we will not tolerate it in our business or in those we do business with. From the confines of our working environments, it is sometimes difficult to grasp the scale of the damage that bribery does to societies. It is not a victimless crime; far from it:

"Corruption ... undermines democracy and the rule of law, leads to violations of human rights, distorts markets, erodes the quality of life and allows organised crime, terrorism and other threats to human security to flourish. This evil phenomenon is found in all countries - big and small, rich and poor...corruption hurts the poor disproportionately by diverting funds intended for development, undermining a government's ability to provide basic services, feeding inequality and injustice and discouraging foreign aid and investment. Corruption is a key element in economic under-performance and a major obstacle to poverty alleviation and development."
(Kofi Annan, former UN Secretary General)

Ford Packaging Systems Limited also condemns the use of slave or child labour and we will not tolerate it in our business or in those we do business with.

Our Code of Conduct sets out in detail how you should behave and what you should do if you are confronted with corruption or if you believe that any of our suppliers are using slave or child labour to produce the products they supply to us. We expect that all of you will embrace the Code and its values and use them in all aspects of your day-to-day work.

The Code is for your benefit as much as for Ford Packaging Systems Limited.

If convicted of a bribery offence, Ford Packaging Systems Limited might get a significant fine and suffer lasting reputational damage. If you are convicted of a bribery offence, you could face up to ten years in prison. The potential harm done by bribery, both to Ford Packaging Systems Limited and to you, is long term and hugely outweighs any potential short term gain. Bribery is just not worth the risk.

If any of our suppliers use slave or child labour then the Company might suffer reputational damage and lose customers based in certain jurisdictions.

If you have any doubts about anything at all, refer to the Code of Conduct or you can speak to the MD in complete confidence.

We are committed to eradicating corruption and the use of slave and child labour and we will stand by you in acting ethically.

Remember, take the RIGHT approach:

- **Responsibility.** You are responsible for your actions. If you break the law in relation to corruption, you will have to face the consequences - which could mean a fine, imprisonment, or both.
- **Integrity.** Don't compromise your integrity. If you think something is wrong, ALWAYS report it. If you aren't sure, consult the Code of Conduct. Don't ever let yourself be forced into doing something you know or suspect is wrong.
- **Genuineness.** Always pay genuine prices for genuine goods and services. Never pay over the odds. Agents who ask for especially large fees or commissions may do so in order to pay bribes on your behalf. If this happens, you will be responsible. Excessive payments are obvious and will always be uncovered. Never pay substantially over the odds and those goods may be of doubtful provenance.

- **Honesty.** Act honestly and in good faith at all times and in all aspects of your work.
- **Transparency.** Keep accurate records (including all invoices and receipts) of everything that you do, especially in relation to the payments you make and what they are for. Full and accurate records demonstrate complete transparency and that you have nothing to hide.

Don't bribe. Do the **RIGHT** thing.