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|  | Ethical Policy and Commitment Statement | | Issue No.: 3 |
| | Created by: R. Bundy | Approved by: C. Spencer G. Jones | Issue date: 21.2.2024 |

PrimePac Solutions Ltd. Ethical Trading Policy Statement

At PrimePac Solutions Ltd. we believe strongly in Ethical and Social principles that affect Employees, Customers, Suppliers and our Local Community. We are therefore proud to guarantee that we trade according to the following Ethical Trading Criteria:

- All employment is freely chosen.
- All staff are entitled to belong to trade unions and collective bargaining is respected, to the extent permitted by local law.
- Working conditions are safe and hygienic.
- Child labour is not used.
- Wages are fair and wherever possible exceed the minimum wage.
- Deductions from wages as a disciplinary measure shall not be permitted.
- Working hours are not excessive.
- No discrimination is practised.
- Regular employment is provided for those who are employed on a permanent contract.
- No harsh, cruel, degrading or bullying treatment or practices are allowed.
- No bribery, corruption, blackmailing or bullying is permitted.

As a matter of Principle, we will always strive to exceed them, but as a Minimum we will always meet Legal requirements.

Wherever possible we attempt to ensure that our suppliers subscribe and accept the same Ethical Criteria and it will be a key point when selecting new suppliers.

Glyn Jones

Glyn Jones
21.4.2024

Carolins Spencer

Caroline Spencer
21.4.2024

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1. Policy Statement

PrimePac Solutions Ltd. recognises that our commercial activities have potential to impact on our suppliers and our locality.

As a socially responsible small business our suppliers, local community and customers have a right to expect:

1. Products manufactured by PrimePac Solutions Ltd. are produced under working conditions that are hygienic and safe.
2. All workers involved in the production of products produced by PrimePac Solutions Ltd. using materials sourced from direct suppliers, indirect suppliers and our own service providers are treated with full consideration to their basic human rights.
3. PrimePac Solutions Ltd. acts in an ethical manner above and beyond basic legal requirements.
4. PrimePac Solutions Ltd is committed to implementing the principals of the Ethical Trading Initiative Base Code.
5. This policy sets out PrimePac Solutions Ltd.'s commitment to its suppliers and customers, setting out the measures we are taking to ensure that we are acting in an ethical manner.

2. Organisational Commitment

PrimePac Solutions Ltd is committed to its suppliers, service providers and customers and recognises that our ethical and social performance and reputation is a key part of our overall commercial success.

Employees

PrimePac Solutions Ltd is committed to ensuring that our employment practices and the enforcement of applicable regulations ensure the protection of the rights of all those who work for us. In many areas we aim to operate above the minimum standards required by law to ensure our employees are safe, rewarded and valued.

Customers

PrimePac Solutions Ltd is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices. This is achieved through the sharing of policies, supplier and product information.

Suppliers

PrimePac Solutions Ltd is committed to social standards in our supply chain, and we encourage our suppliers to operate to the same ethical standards we employ ourselves.

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3. PrimePac Solutions Ltd Ethical Trading Code of Practice

This Code of Practice applies to Staff directly employed by PrimePac Solutions Ltd. on temporary or permanent contracts. Staff employed or provided by contractors or employment agencies to work on PrimePac Solutions Ltd. premises or to undertake work for or on behalf of PrimePac Solutions Ltd.

1. No forced, bonded or involuntary labour shall be used. All employment with PrimePac Solutions Ltd is freely chosen. Staff are free to leave PrimePac Solutions Ltd. after reasonable notice.
2. No child labour shall be used. There shall be no recruitment of child labour. Children or persons under 16 are not employed at any time, day or night. Children or persons under 18 are not employed full-time.
3. All employees have the right to join a recognised trade union. Union representatives can carry out their duties without hindrance. PrimePac Solutions Ltd has an open attitude towards the activities of trade unions.
4. Working conditions are safe and hygienic. PrimePac Solutions Ltd. takes adequate measures to prevent accidents and minimise potential hazards. Staff receive regular health & safety training. Staff have unrestricted access to toilet facilities and drinking water. PrimePac Solutions Ltd has a Health & Safety Policy.
5. Working hours and remuneration are reasonable and comparable to other companies in our sector and regular employment is provided. Staff pay rates are above the national legal minimum standards. Staff are not forced to work more than 48 hours per week, a voluntary opt out agreement is available for those wishing to work more than 48 hours per week. Staff are provided 2 days off per week. Staff are given written terms and conditions of employment that details the employment relationship between and the respective obligations of the employee and employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment.
6. No deductions are made from wages as a disciplinary measure and pay slips detailing lawful deductions are provided for each pay period. Labour only contracting, sub-contracting and fixed term contracts are not used to avoid obligations under labour or social security laws.
7. No discrimination is practised. There is no discrimination in pay, hiring, compensation, access to training, promotion, and termination of employment or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political

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affiliation. Opportunities for personal and career development are equally available to all employees.

8. No harassment, threats, abuse or intimidation shall be practised. Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited and grounds for summary dismissal, if proved.

9. Employment Agencies contracted to supply temporary staff shall demonstrate commitment to and application of the requirements of this code. Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to PrimePac Solutions Ltd. are eligible to work in the UK by:

- Following Immigration and Nationality Directorate Guidelines on Amendments to Section 8 of the Asylum and Immigration Act 1996.
- Ensuring that the requirements of the Immigration and Asylum Act 1999 Section 22 Code of Practice are met.
- Retaining copies of identity papers, work permits, or passport stamps as detailed in the Home Office List of Specified Documents and UK Passport Stamps.

Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to PrimePac Solutions Ltd. have sufficient command of English to understand the following points or have other measures in place to ensure that all these requirements are communicated in the employee’s native language:

1. The agency’s responsibilities under this code of practice.
2. PrimePac Solutions Ltd. Health & Safety Policy.
3. PrimePac Solutions Ltd. Food Safety requirements.
4. Written statements of employment particulars.

10. PrimePac Solutions Ltd. are committed to sustainable growth whilst acting in a socially and ethically responsible way. We adopt a policy of continual review, monitoring and improvement within all aspects of the business. We look to best practice and current legislation as the benchmark for these improvements. We believe it is our moral responsibility to our employees, customers, supply partners and the community at large to act in an ethically responsible manner.

Revision Control

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| 1 | 22.2.2017 | Initial Release |
| 2 | 27.9.2023 | Updated to remove Steve Meredith |
| 3 | 21.2.2024 | Updated to reflect current processes and practice |