



Corporate Social and Ethical Responsibility Policy

Introduction

The policy of Rajapack is that we will act as good corporate citizens, in order to achieve this we will observe the following detailed policies.

General

We will observe the laws and regulations of the country in which we operate, in addition we will:

- Contribute to economic, social and environmental progress to achieve sustainable development
- Respect the human rights of those affected by our activities
- Encourage human capital formation by providing training opportunities for employees
- Apply good corporate governance practices
- Promote employee awareness of and compliance with Rajapack policies
- Refrain from discriminatory or disciplinary action against employees, who act as “whistle blowers” in good faith
- Encourage business partners including suppliers and sub-contractors to apply principles of corporate conduct compatible with Rajapack guidelines
- Abstain from any improper involvement in political activities

Disclosure

Rajapack are committed to disclosing information on our activities in accordance with the Listing Rules of the Financial Services Authority. All disclosed information of both a financial and non-financial nature will be accurate and disclosure will be made on a timely basis.

Employment and Industrial Relations

We will:

- Respect the right of employees to be represented by trade unions or other representative organizations and engage in constructive negotiation to reach agreement on employment conditions
- Not discriminate between employees or potential employees with disabilities or on grounds of age, race, colour, sex, religion, political belief, national extraction or social origin and to offer the same employment opportunities, training, career development and promotion prospects to all
- Promote consultation and co-operation between employers and employees and their representatives on matters of mutual concern
- Provide information to employees and their representatives on issues relevant to them as well as information on the performance of the company and the Group as a whole
- Take adequate steps to ensure occupational health and safety in our operations



Environment

We will take account of the need to protect the environment and promote public health and safety, and we will conduct our activities in order to promote sustainable development, in addition we will:

- Establish and maintain a system of environmental management, which collects and evaluates information on environmental and health and safety impacts of activities and then set and monitor targets for continuous improvement
- Maintain contingency plans for preventing, mitigating, and controlling environmental and health damage including accidents and emergencies
- Recycle or re-use wherever possible waste from operations. If this is not possible then waste will be disposed of safely
- Ensure that the consumption of energy and other resources are minimised
- Develop products that have no undue environmental impact, are safe to use, are efficient in their consumption of energy and natural resources and can be reused, recycled, or disposed of safely
- Ensure that products conform to the relevant legislative requirements
- Provide training to employees in environmental and health and safety matters including the handling of hazardous materials and the prevention of environmental accidents

Conflict Minerals Statement

Rajapack undertakes due diligence to attempt to determine if 'conflict minerals' are used in our products.

Conflict minerals are described as Gold (Au), Tantalum (Ta), Tungsten (W) and Tin (Sn) that are sourced from the Democratic Republic of Congo or adjoining countries from mines controlled by non-governmental military groups.

As part of the Rajapack process for the implementation of new suppliers, our approval questionnaires request direct confirmation that products we purchase do not contain conflict minerals and a self-declaration is also required that the full supply chain process of the suppliers has been examined to confirm this.

In addition, we have also reviewed our supply base, and in particular suppliers of materials that contain the above named minerals. We can confirm that there is no indication that any products supplied by Rajapack contain conflict minerals.

Bribery

No employee should directly or indirectly offer, promise, give or demand a bribe or other undue advantage to obtain or retain business or other improper advantage. All offers of bribes from third parties must be reported to the Rajapack senior management.

Consumers

Rajapack will act in accordance with fair business, marketing, and advertising practices and ensure the safety and quality of goods provided to consumers, in addition we will:

- Ensure that products meet all agreed and legally required standards for consumer health and safety
- Provide accurate and clear information on content, safe use, maintenance, storage and disposal
- Address and resolve consumer complaints



Anti-Slavery Statement

This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out the approach taken by Rajapack to understand all potential modern slavery risks related to our business, and the actions undertaken to mitigate any such risks.

Our supply chain consists of UK suppliers of packaging products and equipment.

Rajapack is committed to delivering high standards of corporate governance and a key element of this is managing in a socially responsible way, we aim to employ the highest ethical and professional standards and always to comply with all local laws and regulations applicable to our business.

We are committed to preventing slavery and human trafficking in our business activities and our supply chains and this commitment is emphasised in our employee training programmes and company policies.

We also expect the same high standards which we set for ourselves from those parties with whom we engage, such as our suppliers and customers.

Due to the nature of our business and our approach to governance, we assess that there is very low risk of slavery and human trafficking in our business and supply chains, however we periodically review the effectiveness of the relevant policies and procedures that we have in place.

We do not employ key performance indicators in relation to slavery or human trafficking as any instance would be expected to be a breach of law, our supplier standards, and our company policies.

Signed on behalf of Rajapack Ltd

Signed

Date: 15th March 2021

Tom Rodda - Managing Director

