

ETHICAL TRADING POLICY

Introduction

Allied Glass Containers is an independently owned premium glass bottle manufacturer who design develop and manufacture luxury glass packaging.

We are committed to conducting our business in an ethical, legal, and socially responsible manner and share with all our customers and suppliers the responsibility to further the fair rights of all workers involved in the production of the product we sell.

We all have a responsibility to ensure all workers are treated fairly, with dignity, respect and without any form of discrimination.

Purpose

The purpose of this policy is to:

- Promote good labour and ethical standards in the supply chain of goods and services, in line with our stakeholder expectations, Company Management System and Company values.
- Promote and raise awareness of fair and ethical trading among our customers and suppliers.
- Establish and maintain Allied Glass's credibility as a purchaser of fair and ethically traded goods and services.
- Meet all requirements of current legislation and industry best practice, where applicable.
- Use our best endeavours to conduct business within the scope of the Ethical Trading Initiative (ETI) Base Code.

Ethical Policy Statement

We will, as a minimum, comply with all current and future legislation affecting the employment and well-being of our employees and we will also endeavour to influence our suppliers to achieve our standards in regard to their employees.

We are committed to ensuring a good standard of ethical and environmental trade practices, including the provision of safe working conditions and the protection of worker's rights across our manufacturing operations and with all our suppliers. Whilst Allied Glass Containers is not a member of the Ethical Trading Initiative (ETI) alliance, we fully endorse their principles. Therefore, this policy reflects the principles of the ETI Base Code and the fundamental principles of the International Labour Organisation (ILO).

Principles of the ETI Base Code

1. Employment is freely chosen

1.1 There is no forced, bonded, or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.



Packaging Materials
CERTIFICATED



OHS 582442



FM 23025



EMS 59503

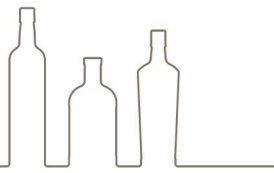
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2. Freedom of association and the right to collective bargaining are respected

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded health and safety training and such training shall be repeated for new or re-assigned workers.
- 3.3 Access to clean toilet facilities and to potable water and if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The Company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

Definition of "child" – every boy and girl under the age of 18.

Definition of "child labour" - work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children.



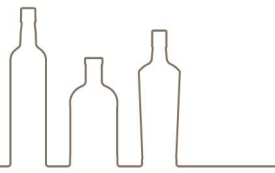
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5. Living wages are paid

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards, or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract and shall not exceed 48 hours per week.*

** International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.*

- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met – this is allowed by national law; this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; appropriate safeguards are taken to protect the workers' health and safety; and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

7. No discrimination is practised

- 7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.



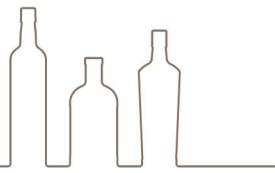
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8. Regular employment is provided

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour only contracting, sub-contracting or home working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed term contracts of employment.

9. No harsh or inhuman treatment is allowed

- 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

In addition to the above, Allied Glass Containers Limited expect the following to be applied:

Entitlement to work

- Only workers with a legal right to work in the country should be employed.
- For workers, including agency workers, original documents should be reviewed and returned to verify right to work.

Labour Agencies

- Labour agencies should only supply workers registered with them.
- Relationships with labour agencies should be covered by a Service Level Agreement which meets all national legal requirements.
- Labour agencies should be audited on a regular basis to ensure compliance with national requirements.

Environmental Standards

Allied Glass Containers Limited takes a close and responsible interest in the environmental issues associated with its operations. We are committed to the continual improvement of environmental performance and the prevention of pollution and set environmental objectives with clearly defined targets and time frames within which to sustain continual improvement. These objectives include:

- To strive towards the highest possible carbon and energy efficiency in every area of operations, with objectives and targets focused specifically on carbon and energy efficiency improvement.
- To formally assess the environmental impact of all new process and equipment, including their energy consumption and associated carbon emissions.
- To prevent future land contamination and minimise polluting emissions to air and water.



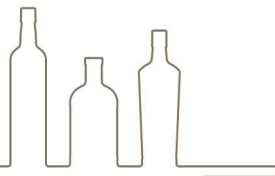
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- To adopt a five-tier approach to waste management that is to eliminate, reduce, re-use, recycle and make safe prior to disposal, using the safest and most responsible means available.

As a minimum we expect our suppliers to comply with applicable local environmental regulations and must demonstrate an awareness of environmental matters and a commitment to improving environmental standards, including without limitation, waste reduction, increased recycling, reduction of pollution, increased use of environmentally friendly products from sustainable sources and are encouraged to develop and implement a meaningful environmental action plan by which progress can be measured.

Anti-Corruption & Bribery

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

Inspection & Audit

Allied Glass Containers Ltd reserve the right to check adherence to the principles of this policy and to conduct compliance audits at any time without notice. Our suppliers shall supply the necessary information and grant access to Allied Glass Containers representatives who seek to verify compliance with the requirements of this policy.

Non-Compliance

By entering into an agreement with Allied Glass Containers, all suppliers agree to and accept the terms of this policy.

We recognise some suppliers may need time and support to ensure compliance with this policy. However, all our suppliers must demonstrate that any breach of our Ethical Trading Policy is addressed in appropriate timescales.

We will work with suppliers to resolve any ethical trading issues. However, if suppliers are unable or unwilling to address critical issues associated with any breach of our policy, within required timescales, we reserve the right to terminate the relationship in accordance with our contractual rights.

Communication

This policy will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.



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