



LINPAC Group Ltd Anti Bribery and Corruption Policy

Introduction

Bribery and corruption offences present serious risks for every business. Breaches of bribery and corruption laws can lead to unlimited fines for companies and imprisonment for individuals. The enforcement of bribery and corruption laws in many countries is increasingly stringent and encompasses activities undertaken by a company through its employees or third parties acting on its behalf across various international jurisdictions.

The purpose of this policy is to set out LINPAC's position on bribery and corruption and detail how responsibility for observing and upholding that position is established across the Group's international operations.

This policy applies to all LINPAC Directors and Employees, Divisions, Businesses, Operating Units and Companies throughout the world, which are part of the LINPAC Group. The policy also extends to dealings with business partners, including agents, distributors, re-sellers, contractors, suppliers and joint ventures.

Policy

LINPAC has a clear policy on bribery and corruption. LINPAC employees do not offer or accept bribes or give or take facilitation payments or gifts made to secure advantage in business transactions, in any form whatsoever. LINPAC also promotes this policy amongst its business partners.

In line with recent changes to the UK Anti Bribery and Corruption legislation, which applies legally required UK standards of conduct on a global basis, the following transactions are strictly prohibited throughout the Group:

- Payments to company employees or their relatives, or to those of a third party, to secure advantage in business transactions;
- Political or charitable contributions made to secure advantage in business transactions;
- Facilitation payments or kickbacks [the giving or accepting of money, gifts, or anything of value that is provided in return for favourable treatment] made to secure or accelerate routine or necessary business actions;
- Gifts, hospitality and expenses payments made to secure advantage in business transactions.

DO:

- Use caution when receiving or giving entertainment or gifts, to or from business contacts or government officials. Refer to LINPAC's Gifts and Hospitality policy, or your local equivalent, for further details;
- Satisfy yourself about the status and integrity of any agent or similar 3rd party and make sure they understand the LINPAC position on bribery and facilitation payments;
- Seek advice and authorisation from your line manager or HR Manager if you are unsure about giving or receiving a gift or anything of value, or providing entertainment;
- Report any concerns you may have about potentially corrupt activities, either within the company or in dealings with third parties, to your line manager or, if appropriate, anonymously through the LINPAC Global Whistleblowing Helpline [see local posters or intranet for telephone contact details] or submit an online report at www.expolink.co.uk/linpac

DO NOT:

- Do Not use entertainment or gifts as a bribe or facilitation payment;
- Do Not offer, accept, solicit or pay bribes or make facilitation payments;
- Do Not use political or charitable donations as a substitute for bribery;
- Do Not use agents or 3rd Parties to offer or accept bribes or facilitation payments indirectly.

Non Compliance

Failure to observe the terms of this policy will constitute a disciplinary offence and can expose individuals to civil or criminal proceedings.

If any employee believes that the terms of this policy are not being correctly adhered to then they should seek to raise any concerns with their line manager or in accordance with the terms of the Company's Global Whistleblowing Helpline Policy. Under the terms of the Company's Whistleblowing Policy, employees are encouraged, without fear of victimisation, to raise any concerns they may have regarding the conduct of LINPAC's business in order that such concerns may be properly investigated.

If you have any queries regarding this policy, please contact your line manager or HR Manager.

June 2011