

Ethical Trading and Human Rights Policy

Our Stakeholders demand quality products and service at all times, and expect us to ensure that those products are produced ethically and sustainably. FMS Foils Group also understands that when people are treated with respect, work in decent conditions and earn fair rates of pay, both they and their companies benefit from increased commitment and productivity.

The following Code of Conduct and Human Rights Policy outlines minimum requirements placed by FMS Foils Group on his suppliers of goods and services concerning their responsibilities towards their stakeholders and the environment. FMS Foils Group also defines their stakeholders as their employees, and any employees of their sub- contractors. FMS Foils Group also reserves the right to reasonably change the requirements of this Policy as necessary to keep up with relevant legislation and to reflect our sustainability targets and ambitions.

Definitions

Child: Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply.

Young Person: Any worker over the age of a child as defined above and under the age of 18.

Child Labour: Any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.

Key Principles

Workforce Rights: All people working for FMS Foils Group (directly and indirectly) are to be treated with respect, and their health, safety and basic human rights must be protected and promoted. Each stakeholder involved with FMS Foils Group must strive to comply with the Ethical Trading Initiative base code (detailed below), which FMS Foils Group has adopted as standard, and with all relevant local and national laws and regulations.

Modern slavery: FMS Foils Group does not tolerate any form of slavery, forced labour or human trafficking within or business or our supply chain. We expect all our Stakeholders (suppliers and customers) to have satisfactory processes in place in order to manage risks associated with modern slavery within their business. All stakeholders are required to inform FMS Foils Group immediately should they become aware of any actual or suspected slavery, forced labour or human trafficking in their supply chain in respect of any products, services or component parts supplied to FMS Foils Group.

Environmental standards: FMS Foils Group stakeholders must act in accordance with the applicable statutory and international standards regarding environmental protection. We also encourage our suppliers to;

1. Monitor, measure and minimize environmental pollution and work to improve environmental

Issue Date 09.11.2022	Authorised By Antonino Cacopardo	Page 1 of 3
Issue Number 1	Path: G:\FMS Induction Pack\Induction\12. Anti Bribery Policy\FMS Ethical Trading and Human Rights Policy.docx	

FMS FOILS GROUP

- performance where possible;
2. Use manufacturing processes that:
 - are energy and resource efficient;
 - contain minimal use of virgin or rare materials;
 - maximise use of post-consumer materials where possible;
 - are non polluting;
 - recycle materials where appropriate;
 - Report on these impacts and activities.

Subcontracting: Suppliers who use subcontractors are responsible to ensure that any subcontractors are aware of the standards set out in this Code of Conduct or have an equivalent policy in place.

Monitoring and continual improvement: To ensure adherence and continual improvement against this agreement, FMS Foils Group reserve the right to assess all stakeholders' operations when it is deemed appropriate. We expect stakeholders to support this process fully and also to encourage their own suppliers to work to these principles.

This policy will be reviewed by the Senior Management and Chairperson every 3 years as minimum or when the board will be notified of any change in legislation or code of practises. Technical department is tasked with keeping the Senior Management Board advised on compliance with the policy and ensuring support is available to the businesses.

Issue Date 09.11.2022	Authorised By Antonino Cacopardo	Page 2 of 3
Issue Number 1	Path: G:\FMS Induction Pack\Induction\12. Anti Bribery Policy\FMS Ethical Trading and Human Rights Policy.docx	

EMPLOYMENT / WORKERS RIGHTS

- a) There must be no use of forced, bonded, slave or involuntary prison labour; employers/workers must be free to work as they choose.
- b) Workers have the freedom to leave employment on giving reasonable notice – there should be no withholding of identity papers/passports/registration documents.
- c) Workers have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- d) Child labour must not be used nor should any other vulnerable groups be exploited.
- e) No-one under the minimum working age shall be employed. Persons under 18 shall not be employed at night or in hazardous conditions; those over the age of 18 shall not be employed in hazardous conditions unless appropriate training & safety procedures are in place.
- f) The working environment must be clean and safe and allow access to drinking water, bathroom facilities and fire escapes whilst providing adequate ventilation, acceptable working temperatures, and provision for first aid and meal and rest breaks.
- g) Accommodation, if provided shall meet the reasonable needs of the employee whilst being also of a decent standard, clean and safe.
- h) Management shall be responsible for providing a safe working environment with workers receiving regular health and safety training. Adequate steps shall be taken to prevent injury to workers.
- i) Working hours and pay complies with all national laws.
- j) Workers' hours should not be excessive with all overtime being voluntary and paid for at a premium rate.
- k) To every extent possible work performed is based on recognised employment relationship established through national law and practice, and all obligations to employees under labour or social security laws and regulations are not to be avoided;
- l) No person must be discriminated against because of their colour, religion, race, caste, sexuality, gender, age or disability, marital status, trade union membership or political affiliation.
- m) No inhumane or harsh treatment of workers shall be acceptable.



P Watson
Managing Director
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10 November 2022

Issue Date 09.11.2022	Authorised By Antonino Cacopardo	Page 3 of 3
Issue Number 1	Path: G:\FMS Induction Pack\Induction\12. Anti Bribery Policy\FMS Ethical Trading and Human Rights Policy.docx	