



ELLIOTT BAXTER & COMPANY LIMITED

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CODE OF CONDUCT -PROCUREMENT, BRIBERY AND CORRUPTION POLICY

Purpose of this policy

The purpose of this policy is to set out the responsibilities for all Elliott Baxter & Company Limited employees; it defines expected behaviours, ethics and the Company position on bribery and corruption. This policy applies to all employees, suppliers, temporary employees or any third party provider of goods and or services to Elliott Baxter & Company Limited. The board is committed to ensuring Elliott Baxter & Company Limited has an anti-corruption culture. We expect our suppliers to have a similar code of conduct in place and to ensure due diligence and risk assessments are carried out.

Bribery is defined as giving someone a financial or other advantage to encourage that person to perform their function or activities improperly or to reward that person having already done so. In the event of a supplier attempting to bribe any of our employees, contractors or temporary employees directly or indirectly, must be reported immediately to the HR Director.

Manager's responsibility

It is the manager's responsibility to provide their teams with a copy of this policy and procedure, ensure their teams understand the context and ensure they adhere to it. If the manager requires any further explanation or its applicability to any situation they should contact the HR Director directly.

Invitations, gifts and personal benefits

Relationships with Elliott Baxter & Company Limited suppliers and customers are based on trust and honesty. The purchase of goods or services on behalf of Elliott Baxter & Company Limited must not allow employees, temporary workers or contractors to get discounts or benefits for their personal gain. All such individuals must ensure they comply with the following:-

Gifts

Individuals must not accept money (or convertibles eg vouchers) gifts, bonuses or any other favour or benefit of any kind from suppliers (excepting in relation to entertainment below). Any offers of this nature must be reported to their Director, stating the nature of the gift offered and the supplier's name. The exception to this is desktop trivia eg; calendars, diaries, small boxes of chocolates etc. All gifts at Christmas must be given to the line manager, these will then be fairly shared amongst all teams.

Entertainment

Elliott Baxter & Company Limited understands there may be a valid reason for accepting hospitality from existing suppliers. Under no circumstances should hospitality be accepted from prospective vendors during the course of any vendor selection/tender process. Such entertainment may be perceived to have influenced decisions and as such any offers should be politely refused. Please note that any entertainment that is accepted must be appropriate on the context of the business relationship between Elliott Baxter & Company Limited and the supplier.

Any individual deviating from this code of conduct or process may be subject to disciplinary action.