

		<b>GAC (UK) Ltd – SOCIAL COMPLIANCE CODE OF CONDUCT</b>			
Document Status:	<b>APPROVED</b>	Document No.	<b>GAC-ETH-001</b>	Date valid:	<b>13/02/18</b>

GAC (UK) Ltd is part of the Volcke Aerosol Connection plc, which is a group of three independent aerosol filling factories. The vision of GAC is to become the groups centre of excellence for cosmetic aerosol products.

### **Mission Statement**

To be the preferred supplier of Cosmetic and Novelty products to key retailers and distributors world-wide based on our ability to consistently provide innovative, competitively priced, quality products, 100% complete and on-time.

### **Core Values**

We endeavour to conduct ourselves and our relationships with stakeholders in a professional and courteous manner. To achieve this we are guided by a set of core values. Our over-riding concern is the **Safety of our employees** which sits at the heart of these values. Our other core value are:-

***Honesty and Integrity***  
***Enthusiasm and Team-work***  
***Recognising and respecting our differences***  
***Loyalty and Trust***  
***Clear, strong Communication***

### **Stakeholder**

GAC (UK) Ltd recognises that it has a duty to maintain the highest standards of social compliance within its business environment through its interaction with its key stakeholders; its employees and business partners. It will achieve this through the application of this Social Compliance Code of Conduct.

### **Scope**

The scope of this document covers all activities at GAC and those of its suppliers and service providers.

### **Code of Conduct**

#### **Forced Labour**

- No form of forced labour shall be used.

#### **Child Labour**

- Local child labour laws are fully respected and where there are no laws, the child labour age and 'young worker' restrictions as dictated by UK law will apply.

#### **Freedom of Choice**

- Employees are free to leave their employment after having given notice and working any notice period. Employees cannot be forced to work by any means.

#### **Slavery and Human trafficking**

- All international/national laws related to slavery and human trafficking will be complied with.

#### **Physical/Verbal Discipline**

- There will be no tolerance of any form of verbal or physical harassment or abuse of employees.

#### **Freedom of Association**

- To the extent permitted by the laws of the manufacturing country, GAC (UK) Ltd shall respect the right of their employees to freedom of association and collective bargaining. This includes

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the right to form and join trade unions and other worker organizations of their own choosing without discrimination or harassment.

### **Equality and Diversity**

- GAC (UK) Ltd firmly believes people are entitled to equal opportunity in employment. GAC (UK) Ltd will not discriminate against their employees in employment, including hiring, salary, benefits, advancement, discipline, termination, or retirement on the basis of gender, race, religion, age, disability, sexual orientation, nationality, marital status, political opinion, trade union affiliation, social or ethnic origin, or any other status protected by country law.

### **Respect and Dignity**

- GAC (UK) Ltd will treat their employees with respect and dignity and operate an anti-harassment policy to enable every employee to understand the different guises in which harassment exists. Physical, sexual, psychological, or verbal harassment or abuse of employees will not be tolerated.

### **Compensation**

- We will fully comply with all applicable wage, working hours and other benefit requirements. Employees will be paid promptly and earn at least the minimum wage required by country law and any legally mandated benefits such as holiday entitlements and statutory severance when employment ends.
- Employment practices such as training or apprenticeship wages, pre-employment fees, deposits, or other practices that effectively lower an employee's pay below the legal minimum wage are not permitted.
- Any overtime hours are consensual and compensated at a premium rate.

### **Working Conditions**

All national/local regulations relating to working conditions will be fully complied with. This will include:-


- Health and Safety requirements including:-
  - Promote safe practices – written Health and Safety policies and procedures.
  - Fire Safety
  - Reduce work related illness and injury.
  - Comprehensive programme of safety risk assessments.
  - Personal Protective equipment (PPE)
  - First Aid support and equipment.
  - Health and Safety Committee and periodic safety training
- Clean, safe and secure working environment.
- Good Lighting, heating and ventilation.
- Access to clean drinking water, hygienic storage for foodstuffs, sanitary and washing facilities.

### **Compliance with Regulations**

- GAC (UK) Ltd will comply with all Aerosol industry and Cosmetics Regulations and will confirm this through periodic and mandatory third party testing for product safety.

### **Environment**

- GAC (UK) Ltd will protect human health and the environment by meeting applicable regulatory requirements, including those covering air emissions, solid/hazardous waste, and water discharge.
- GAC (UK) Ltd will adopt reasonable measures to mitigate negative operational impacts on the environment and strive to continuously improve environmental performance.

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- Waste streams will be monitored, measured and reviewed and disposals will be organized with registered and competent third parties.
- Explore opportunities towards sustainable management of resources.

**Monitoring**

The effectiveness of this policy will be reviewed at least annually through the Management Review and will also be considered during the quarterly Board Meetings.

**Continuous Improvement**

We will strive to continually improve our performance through internal review, using reputable supply partners and inviting our suppliers to confirm their cooperation with this policy.

G. Ricketts  
Site Director

Date: February 13<sup>th</sup> 2018