



PORTALS



Our code of
business principles

Foreword

Portals proudly puts its people and customers at the heart of the business. We deliver exceptional performance by driving innovation and change, working with pace and a positive attitude.

Portals has been making paper for the world's leading security printers for over 300 years. This heritage has been built on our customers' trust – to deliver to the highest standards and to conduct ourselves as the pre-eminent papermaker we are. To maintain this trust and to ensure our business' future success, the way we all conduct ourselves is important.

Expectations of ourselves and each other are built on Portals' five core values – Pace, Performance driven, Adaptable, Customer focused and Engaged, combined with this code of business principles.

As Portals, we are committed to the highest ethical standards. Whatever our roles are and wherever we work, we have a responsibility to ensure that we demonstrate integrity in the way we behave with each other, our customers and other partners.

See page 6 of this booklet for details

We also have a responsibility to speak up if we see behaviours which are not consistent with our values or this code, and which compromise our personal or business integrity.

It is important that every employee, contractor and supplier reads, understands and follows this code. If you are unsure about anything, you must ask for advice. We have locally based Ethics Champions who can help you or direct you to someone who can. You can also ask for advice from your line manager, any senior manager, the Executive Leadership Team or a member of the HR team.

Thank you for your continued support.



Ross Holliday

Chief Executive Officer

Contents

Who is the code for?	4
Where to find advice or to raise a concern	6
Health, safety and the environment	8
Fairness and respect	10
Records and reports	12
Conflicts of interest	14
Protecting personal information	16
Competition and anti-trust laws	18
Bribery and corruption	20
Gifts and hospitality	22

Who is the code for?

This code applies to all Portals employees and the partners we work with worldwide.

Everyone is required to read, understand and follow this code and all related policies.

It is the responsibility of managers to lead by example and provide appropriate support to enable their teams to understand both the spirit of this code and how the code and related policies are to be applied in practice.

The code outlines Portals' core commitments, what they mean and how they should be upheld at all levels within the company. You must be prepared to use good judgment and apply common sense in deciding the right actions to take because this code cannot cover every situation that may arise. You should ask questions if you are unclear about any aspect, or if you are unsure how to respond to an issue that this code does not address.

It is expected that you will promptly report any known or suspected breach of the code or related policies. This is important to our business and our brand.

Need advice or want to raise a concern?

See page 6 of this booklet for details

Failure to comply with this code or its related policies will be investigated and appropriate action taken.

It is our personal responsibility to ensure that the company's business is conducted in absolute compliance with applicable laws and company policies.

All contractors, suppliers, partners and representatives of Portals worldwide must be made aware of the terms of the code and they are expected to abide by them.

Ask yourself

Am I acting in accordance with Portals' code of business principles?

Have I understood the risks?

Do I need advice to make an informed decision?

Have I considered any potential impact on Portals' reputation?

How would I feel if my decision or action appeared on the front page of a newspaper?

Where to find advice or to raise a concern

Anyone who raises a concern in good faith will be listened to and treated with respect.

If you believe that this code has been or is being breached, or is at risk of this happening, please raise your concerns promptly. You can speak to any member of the Executive Leadership Team, your line manager, the HR Department, or one of our Ethics Champions.

Alternatively please use our confidential and independent helpline on **0800 374 199** where you will have the option to remain anonymous should you wish to do so.

If you have any questions about this code then you can also speak to one of these parties for clarification.

Your concerns will be taken seriously and will be investigated quickly. If there is a breach of this code then appropriate action will be taken.

There will be no consequences for anyone who reports concerns in good faith, and we will not tolerate any act or threat of retaliation against anyone who raises such a concern. However if you knowingly make a false allegation or provide false information you will be subject to disciplinary action.

Ethics Champions

How they can help

We have Ethics Champions in Overton and Bathford.

Their role is to ensure that information on policy and practices is communicated, understood and followed by all Portals' employees and will help ensure the code of business principles (CBP) has a high-profile on the site.

The Ethics Champions' key role is as an advisory contact point for CBP matters. They will answer queries and help to point you in the right direction if you are unsure what actions to take.

If you are unclear who your Ethics Champions are then please ask your line manager or the HR department.

Health, safety and the environment

We are committed to keeping our employees safe in the workplace and behaving in an environmentally sustainable manner.

We all have a responsibility for health, safety and the environment at work and we must work safely to protect ourselves and our colleagues.

It is important to understand and follow the health and safety procedures where you work, whether it is a manufacturing area or in an office. Always ask if you are unsure.

We must make sure that we understand and follow safety requirements when we are visiting another location, whether it belongs to Portals or to a contractor, supplier or customer.

If you have a safety, environmental or security concern you should report it on a 'my concern' or 'near miss' form, available at both sites.

All near misses must be recorded and accidental injuries must be reported to your line manager on the day of the accident.

Need advice or want to raise a concern?

See page 6 of this booklet for details

To help protect the environment and minimise damage caused by business and manufacturing processes, we must conserve resources.

We have an Environmental Health and Safety Policy and this is available on our website and in our sites for all employees and contractors to read.

Do the right thing

Take responsibility for safety, don't leave it to someone else.

Remember that health and safety is relevant wherever you work.

Suggest any improvements that you feel could be made to managing health and safety and the environment in your area.

Look for ways to protect the environment and minimise the impact caused by business processes.

Fairness and respect

We work hard to create an environment where everyone is treated fairly.

Our relationships with our colleagues and business partners should be based on respect, consideration and honesty at all times.

We will not tolerate discrimination on the grounds of age, disability, marital status, gender, religion, race, sexual orientation, pregnancy and maternity or any other status protected by law. If we feel that we or others have been subject to discrimination or harassment, we should report it.

We recognise the importance of the range of skills in our workforce and in giving everyone an equal opportunity to achieve their full potential.

All decisions about recruitment, promotion and development must be made on the basis of a person's ability, experience, behaviour, work performance and level of potential in relation to the needs of the role.

Portals fully supports the principles set out in the UN Declaration of Human Rights, and the guidelines of the International Labour Organisation (ILO). This includes respecting diversity, supporting the drive to abolish child labour and complying with national legal requirements regarding the minimum wage and working hours.

We have a Modern Slavery Statement and this is available on our website and in our mills for all current and prospective employees to see.

Do the right thing

Support and encourage diversity and creative ability.

Behave towards others with honesty, courtesy, consideration, respect and dignity.

Promote and recruit on the basis of merit and encourage the continuous development of people's skills and abilities.

Report any inappropriate conduct directed to you or others.

Records and reports

We will ensure our records and reports are accurate and true.

All records and reports for internal and external use must be accurate and true.

We must understand and follow the legal requirements that apply, and must ask for advice if we are unsure about any records or reports that we are preparing.

We are committed to supplying high quality products to all customers and we must not use false information to flatter business results or production performance.

We must also protect records to ensure that they cannot be accessed or altered in an unauthorised manner whether held in hard copy or electronic form.

If we see any records that we do not believe to be correct, or suspect that they have been designed to mislead the reader, we should report it.

Do the right thing

Ensure that all records and reports that you prepare are, to the best of your knowledge, accurate and true.

Protect information and records from unauthorised access.

Report any incidents or suspected incidents of false reporting or record-keeping.

Conflicts of interest

We will not allow personal or family interests to influence our professional judgment or activities.

We must ensure that when taking work-related decisions we do not put our personal interests before the good of the business.

Relationships with third parties such as customers, consultants, suppliers and competitors should be conducted in a professional, impartial and competitive way. We must not accept gifts or favours that may influence our view of a third party.

Our position in Portals may give us access to confidential information. This should not be used for personal or company gain, whether direct or indirect.

The employment of family members is not prohibited, but is covered by specific conditions that should be strictly followed.

If you have an interest in a company or are connected to an individual who is being considered as a supplier, contractor or customer, you should declare this interest and avoid any involvement in the appointment process.

It is not possible to list all the situations that might be considered as a conflict of interests. We must use our good judgment to ensure that actual conflicts are avoided and potential conflicts declared, recorded and resolved.

Do the right thing

Declare any potential conflicts of interest and seek advice from your line manager.

Do not use your position at Portals for personal benefit or to benefit a family member, friend or associate.

Never accept gifts or entertainment if you suspect that they are intended to secure an improper advantage.

Protecting personal information

We will protect personal information and use it only in accordance with data protection law.

The business needs to hold a certain amount of information about its employees, customers and business partners.

We have to protect this information as no employee would want their personal details shared without their consent.

Data protection laws regulate the collection, storage, use and disclosure of personal information about individuals.

Any personal information must be obtained and used in a fair and legal manner. It must be kept securely and when it is no longer required, the information should be securely destroyed.

If we receive business-related files that include personal information, we must treat this with respect.

We must understand that some sensitive personal data has stronger legal protection and must treat this information in an appropriate manner.

Do the right thing

Personal information should only be shared with colleagues and third parties if they have a legitimate need to know it and if we are confident that they will maintain the necessary level of confidentiality. If in doubt, check with HR before passing on any personal information.

Different laws may apply in other countries so seek advice before requesting or using information outside its country of origin.

We have a General Data Protection Regulation (GDPR) Privacy Notice and this is available to all prospective and current employees.

Make sure that you follow legal requirements if you need to collect personal information.

Consult your line manager or HR team if you are unsure about either giving or collecting personal information.

Destroy any information that is no longer required, and keep secure any personal information that you are holding.

Competition and anti-trust laws

We are committed to competing in an open and fair manner.

Competition and anti-trust laws support and encourage healthy competition, ensure a level playing field for all parties, and protect our customers. They prevent companies from entering into anti-competitive agreements with each other or from taking unfair advantage of a dominant position.

Agreeing prices with competitors, dividing market share and rigging bids are examples of activities that limit competition and are illegal.

We must only seek to win business through lawful means and must not enter into agreements and understandings that are anti-competitive.

If we have a dominant or monopoly position in a market, we must ensure that we do not use that position to keep competitors out, or take advantage of customers.

If you find yourself in a position where you might meet competitors, such as at a trade fair or bid opening, take advice to ensure that you comply with all relevant policies.

Do the right thing

Promote our products and services on their merits to customers rather than through unfair criticism of competitors' offerings.

Make sure that you understand and follow the latest guidance on avoiding anti-competitive practices – for example, in situations where you might meet a competitor.

Report any incidents or suspected incidents of anti-competitive behaviour.

Bribery and corruption

We will ensure that neither we nor our representatives offer, pay, seek, accept or encourage bribes.

The payment of bribes is one of the most common forms of corruption and creates unfair advantage in business and in society.

A bribe is an offer, promise, or provision of something of value to assist in obtaining or retaining business, or securing an improper advantage either personally or for Portals.

In accordance with the UK Bribery Act 2010, we do not pay or accept bribes, nor must anyone acting on our behalf. We do not permit agents, contractors, consultants or other third parties to engage in this type of conduct.

Gifts and hospitality may be offered and accepted but must be modest and appropriate and should not be capable of misinterpretation if publicly disclosed.

Portals makes no distinction between bribes and facilitation payments, which are also prohibited. A facilitation payment is a small payment to an official to encourage or speed up the performance of their duties.

Be cautious about charitable donations to a customer territory, and seek advice first to ensure that they are appropriate.

Do the right thing

Never make or authorise payments or gifts if you suspect that they are intended to secure an improper advantage.

Ensure that any gifts or entertainment are authorised by your line manager before being offered.

Report any suspicion of potentially corrupt behaviour, whether by a Portals employee or a third party working on our behalf.

Seek advice before agreeing to any charitable donations requested by or related to a customer or third party.

Gifts and hospitality

We can offer and accept only modest and appropriate gifts and hospitality.

Giving or exchanging gifts and hospitality can often help develop business relationships, but wrongly handled may give the appearance of bribery. Anyone intending to offer a gift or hospitality must ensure that this is done within the company guidelines.

Customers should be encouraged to visit production locations, but we must ensure that the visit is purely for professional purposes and that the extent and value of the hospitality being offered is clearly documented and not extravagant.

Any representative of our business should be advised that they must not offer gifts or hospitality on our behalf without written approval in advance, and they must provide receipts if proposing to claim expenses.

If arranging tickets to an event you must ensure that the event is appropriate and that guests are accompanied by a Portals' employee responsible for the relationship.

See page 6 of this booklet for details

Different cultures place different importance on gift-giving. We should understand and respect local customs and laws, avoid situations that could cause embarrassment and immediately report anything that falls outside the company guidelines.

We have a Gifts and Hospitality Policy and this is available to all employees to read and understand.

Do the right thing

Ensure that any gifts or entertainment are authorised by your line manager in advance of being offered and are added to the Gift Register.

Always notify your line manager in writing of any gifts or entertainment received and enter it in the Gift Register.

If giving a gift, something showing the Portals' crest or logo is better than an anonymous item.

Gifts or hospitality should never influence business decision-making processes or cause the perception of influence.

Seek advice before agreeing to any charitable donations requested by or related to a customer or third party.
