

Kite's Code of Ethics

It is the policy of Kite that its business shall be conducted in a way that sets high standards of honesty, respect for the laws of the society in which it operates and individual rights and freedoms within those laws.

- ◆ **Reporting our financial results and integrity of financial records**
We have a system of internal controls intended to ensure the completeness and integrity of our records and information. We communicate our financial results in a full, accurate and timely manner.
- ◆ **Quality services and products**
We comply with ISO 9001 and ISO 14001 and are committed to supplying quality services and products to our customers and to consider our environmental impact across all our activities. Our quality management system adopts a system process approach with an emphasis on risk-based thinking. In this way we can ensure that we deal with potential problems proactively with the intention of mitigating issues before they occur.

At a number of our sites, we hold Certificates of Conformity: 'BRC Global Standards - Storage and Distribution'.
- ◆ **Competing ethically**
We do not engage in unethical or illegal trade practices and look to gain competitive advantage through superior performance.
- ◆ **Competition Law**
Kite is committed to strictly adhering to competition law and regulations and will not condone any activity that represents a breach of competition law by any of its employees.
- ◆ **Conflicts of personal interest**
Kite employees may not engage in activities or enter into relationships, directly or indirectly, that compete with Kite. All employees must avoid relationships or conduct that may compromise judgment or create conflicts (actual or apparent) between their personal interests and their loyalty to Kite. Further, Kite employees may not use their position in Kite to obtain improper benefits for themselves or others.
- ◆ **Acting with integrity**
Kite engages in business practices that are consistent with Kite's ethics and values. No employee in Kite may offer or accept bribes, kickbacks or inappropriate gifts or entertainment.
- ◆ **Modern Slavery Act**
Kite is committed to complying with the Modern Slavery Act of 2015 and is transparent about what is happening within its business and is taking steps to ensure that slavery and human trafficking is not taking place within its organisation or supply chain.
- ◆ **General Data Protection Regulation (GDPR) and Privacy Policy**
Kite complies with the GDPR and the Data Protection Act 2018 and sets out how it processes personal data in Kite's Privacy Policy on Kite's website kitepackaging.co.uk.



Kite’s Supplier Code of Conduct

- ◆ **Ethics**
 Suppliers to Kite shall commit to the highest standards of ethical conduct when dealing with Kite and shall prohibit any and all forms of corruption by its employees in dealing with Kite. Specifically, suppliers shall not offer any Kite employee, directly or indirectly, any gift or similar, which could be seen as a bribe to obtain improper advantage.

- ◆ **Anti-corruption**
 Kite is committed to complying with anti-corruption laws that prohibit bribes, kickbacks or other corrupt actions to obtain or retain business. All suppliers to Kite are expected to comply with applicable anti-corruption laws in their dealings with Kite.

- ◆ **Modern Slavery Act**
 Kite is committed to complying with the Modern Slavery Act of 2015. All suppliers to Kite are expected to comply with the provisions of the Modern Slavery Act 2015 which requires them to be transparent about what is happening within their business and to confirm that they are taking steps to ensure that slavery and human trafficking is not taking place within their organisation or supply chain.

- ◆ **Gifts and entertainment**
 Kite acknowledges that it is customary for some of its suppliers to occasionally give small gifts or offer modest business entertainment to those with whom they do business within Kite. This is acceptable provided, that in each instance
 - the gift or entertainment is of modest value
 - is unsolicited
 - is not a bribe, kickback or other illegal payment or a disguised version thereof
 - would not embarrass Kite if made public
 - does not create the appearance that the gift-giver is entitled to preferential treatment in their dealing with Kite whether it be for the award of business, retention of business, better prices or improved terms of trade.

- ◆ **Compliance monitoring**
 The supplier agrees to co-operate with Kite to investigate any allegations of wrongdoing, misconduct or corruption of any Kite employee related to the employee’s dealings or relationship with the supplier. Suppliers to Kite shall bring any known breach of this Code, as soon as such breach comes to light, to the attention of Kite’s auditors, Dafferns LLP, at kiteconfidential@dafferns.com.

- ◆ **General Data Protection Regulation (GDPR)**
 All suppliers to Kite are expected to comply with GDPR and the Data Protection Act 2018.

We/I understand and will abide by Kite’s Supplier Code of Conduct			
Signature:		Date:	
Print Name:		Position:	
Supplier:			