



Code of Business Conduct

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1. Introduction

The Premier Paper Group strictly complies with all applicable laws and regulations. Our reputation is built on our clear set of values, by ensuring that our actions align to them every day, this in turn enables us to build trust with all our stakeholders.

We will always work with responsibility, integrity and sustainability in our business activities. Our commitment to operating in an ethical manner is fundamentally important to ensuring the future success of our business.

Our Values:

- **Responsibility** – *Corporate responsibility is an integral part of our business. Our Health & Safety, Anti-Slavery, Anti-Bribery and Equality policies are clear and uncompromising.*
- **Integrity** – *We behave with integrity at all times; in our dealings with customers, suppliers, employees, and the local communities where we are present.*
- **Sustainability** – *From the sustainable sourcing of products, through to our day-to-day activities, our aim is to minimise any adverse environmental effects resulting from our operations.*

Our Code of Conduct is structured in the following four sections:

- (i) *Health & Safety, Environment & Sustainability*
- (ii) *Business Integrity*
- (iii) *Care & Respect*
- (iv) *Assets, Confidentiality & Privacy*



A Message from Michael

All company policies are continuously monitored and updated on a regular basis by our management team and the Internal Audit, Risk & Compliance Department.

A programme of employee training is in place, utilising a Managed Policy Acceptance Service administered by our third-party supplier.

We encourage all our employees, customers, suppliers, and other business partners to refer to our Code of Business Conduct.

If you ever have a genuine concern that our code is not being followed, employees can report this to their line manager, HR, or the Internal Audit, Risk & Compliance Department or confidentially via the whistleblowing procedure.

For external parties, please write confidentially to the Premier Paper Group ethics email address – codeofconduct@paper.co.uk

Michael Beever
Premier Paper Group CEO

2. Health & Safety, Environment & Sustainability

2.1 Health & Safety



The Premier Paper Group makes an annual statement of its Health & Safety Policy in which it recognises its responsibilities to protect all its employees (including contractors and temporary workers) and associates.

All employees are provided with the appropriate equipment, training, and supervision as is necessary to achieve the overriding objective of a workplace free from injuries.

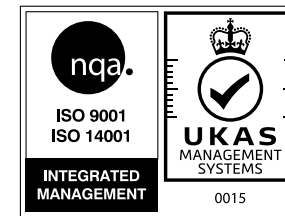
There is collective responsibility amongst employees to disseminate Health & Safety initiatives within the business, to assess risk hazards and to prevent and report any unsafe situation.

2.2 Environmental Responsibility

The Premier Paper Group was the first paper merchant to achieve ISO 14001 accreditation in 1997 and now holds chain of custody certification for FSC® and PEFC environmental standards.

Complying with ISO 14001 provides assurance to our stakeholders that our environmental impact is being measured and improved. A responsible, commercial approach to environmental issues is at the heart of a programme of continuous improvement.

Our processes and systems ensure that we adhere to all the FSC® and PEFC guidelines, thus ensuring that we continue to achieve our recertification.



2.3 Sustainability

The Group is aligned with the international conscience about sustainability. This has been demonstrated through commercial and operational changes we have made to reduce and minimise our environmental impact, for example:

- *Bringing to market paper-based alternatives to single use plastics.*
- *Investing in fuel efficient commercial vehicles with reduced CO2 and NOX emissions.*
- *Introducing more electric and hybrid cars into our fleet to reduce emissions.*
- *Installing charging points at all branches to encourage use of electric vehicles.*
- *Installing LED lighting throughout our Head Office and our larger regional warehouses.*



2.4 Our journey to Net-Zero with Carbon Capture®

As part of the UK's Net-Zero strategy, the Committee for Climate Change (CCC) recommends the planting of 30,000 ha per year from 2024, the equivalent of 1.5 billion more trees by 2050.

To help achieve this, we are investing in natural climate solutions by planting trees across the UK through the Woodland Trust.

Through our Carbon Capture® programme, we offer our customers and their clients the opportunity to demonstrate their sustainable goals by mitigating the CO2 emissions generated by the production, storage, and distribution of the products they have purchased.

The Carbon Capture® programme has raised over £1.83m to date for the Woodland Trust, planted more than 480,000 trees and captured over 110,000 tonnes of CO2.

We have also participated in restoration projects, assisting with the Trust's aim to protect and restore the UK's precious ancient woodland.

2.5 EcoVadis

EcoVadis operates an evidence-based online platform, providing sustainability ratings and allowing companies to assess the ESG performance of their global suppliers.

It considers a range of Corporate Social Responsibility issues, which are grouped into four themes: 'Environment', 'Labour & Human Rights', 'Ethics', and 'Sustainable Procurement'.

Premier Paper Group have subscribed to the EcoVadis programme and continue to monitor, measure and improve our sustainable performance rating.



2.6 EU Deforestation Regulation (EUDR)

The EU has been actively working to combat deforestation and promote sustainable practices across various industries, including the paper and pulp sector.

Regulations aimed at promoting deforestation-free products may have an impact on UK based paper merchants, especially those operating within the European Union (EU).

As part of our FSC® and PEFC compliance initiative we have implemented our DDS programme which involves compliance with UK Timber Regulations, but would exclude Recycled Materials.

We are keenly watching FSC® integrated solutions, enabling us to track the paper journey through the entire supply chain, meeting EUDR traceability requirements and providing the ability to generate due diligence statements for submission to the EU.

Adapting to regulations on deforestation-free products are challenging, but it demonstrates our commitment to environmental responsibility and contributes to global efforts in mitigating deforestation.

We are embracing sustainable sourcing practices, ensuring supply chain transparency, and promoting eco-friendly products, positioning ourselves as key contributors to the preservation of forests and biodiversity.

2.7 Plastic Packaging Tax

To ensure that we remain in compliance with the Plastic Packaging Tax Regulations 2022, we continue to monitor the products that we purchase.



2.8 Packaging Waste

We are registered with a compliance scheme provider to ensure that we discharge our responsibilities under the Producer Responsibility Obligations (Packaging Waste) Regulations 2007.

Furthermore, we are also closely monitoring the requirements of the newly introduced Extended Producer Responsibility (EPR) reporting requirements.

2.9 Alcohol & Drugs

All individuals working for Premier Paper Group are required to be 'fit for work' at all times and comply with our Alcohol and Drug Abuse Policy.

2.10 Community Support

The Company only makes charitable donations and provides sponsorship that are legal and ethical in accordance with the Company's internal policies and procedures.

The Group engages with and supports several charities including contributing to the work of Breast Cancer Now and the Stationers' Foundation.

We also work with 'In Kind Direct' which supports a network of charities throughout the UK.

By providing regular product donations and support, Premier Paper Group is helping people most in need.



3. Business Integrity

3.1 Conflicts of Interest

Any employee or third party who has a direct or indirect personal or financial interest in a business transaction or other business arrangement which may, or have potential to, conflict with their obligation to act in the best interests of the business, shall declare such interest to their line manager immediately and prior to commencement of that transaction or arrangement (who will in turn report this to a Director).

3.2 Gifts & Hospitality

Whilst our policies are not intended to prevent the establishment and building of business relationships, inappropriate (i.e. excessive or lavish) gifts and entertainment can be seen as a way to unfairly gain business advantage and could be perceived to be a bribe.

The principles under which gifts and hospitality is regarded as normal and appropriate have been set out for employees to adhere to.

3.3 Anti-Corruption and Bribery

The Group takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships and implementing and enforcing effective systems to counter bribery.

Our position on this is clearly set out in our Anti-Corruption and Bribery policy that all employees have visibility of and are required to adhere to.

3.4 Money Laundering

We are committed to complying with all anti-money laundering laws and regulations. We do not condone, facilitate, or support money laundering or terrorist financing.

3.5 Competition Law

We always engage in fair competitive business practices in compliance with all applicable anti-trust and competitive legislation e.g. The Competition Act 1988.

We promote free and open competition in the market and will not engage in any activities that could reasonably be construed as being anti-competitive or unfair (i.e. sharing information with competitors, price fixing or bid rigging, etc.).

3.6 Political Contributions

We do not make political contributions including any donation to support a candidate, party or political cause.



3.7 Supplier Relationships



Our suppliers are key stakeholders and contribute to the success of our business. Working with responsible suppliers is an important part of our Corporate Social Responsibility.

We expect all our suppliers to adhere to the highest standards of ethics and to demonstrate that they provide safe working conditions, treat employees with dignity and respect, act within the law in their use of labour and have sound environmental stewardship.

To this end, our onboarding process requires suppliers to complete a questionnaire confirming various declarations, ensuring they align to our own values and standards of conduct in business.

3.8 Tax Evasion

As an organisation we have undertaken a risk assessment and implemented several internal steps to respond to The Criminal Finances Act 2017, reflecting our zero-tolerance to tax evasion and facilitation of tax evasion.

All suppliers to Premier Paper Group are requested to confirm that their company, employees, and any third parties acting on their behalf are not engaging in any activity, practice or conduct which would constitute tax evasion.

Appropriate employees are trained in regard to this matter and a system is in place to escalate red flag situations.



4. Care & Respect

4.1 Equality & Diversity

The Company recognises that it is essential to provide equal opportunities to all persons without discrimination.

Guidance has been provided to employees at all levels to act fairly and prevent discrimination on the grounds of sex, trans-gender status, married or civil partnership status, pregnancy / maternity, race, religion or belief, sexual orientation, age, or disability.

The Company is committed not only to its legal obligations but also to positive promotion of equality of opportunity in all aspect of employment.

As required by the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017, the Company produces and publishes a Gender Pay Reporting Statement.



4.2 Respecting Human & Labour Rights

Our organisation is absolutely committed to preventing slavery and human trafficking (as defined under the Modern Slavery Act 2015) in its corporate activities, and to ensuring that its supply chains are free from slavery, human trafficking, and child labour.

We operate several policies to identify modern slavery risks and to take steps to prevent slavery and human trafficking including Charter of Corporate Behaviour, Employee Code of Conduct and Procurement Standards.

4.3 Working Hours & Remuneration

We comply with all employment legislative requirements in regard to working hours and remuneration and the fair treatment of our employees.



4.4 Bullying & Harassment Policy

The Company has a 'Bullying & Harassment Policy' and recognises its responsibility to ensure that all employees are free from any discriminatory behaviour in the workplace and that they are treated with dignity and respect.

4.5 Whistle Blowing Policy

It is important to our business that any fraud, misconduct or wrongdoing by employees or officers of the organisation is reported and properly dealt with.

The organisation therefore encourages all individuals to raise any concerns that they may have in regards to the conduct of any employee or the way in which the business is run.

The Whistle Blowing Policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

4.6 Employee Awareness & Training

Employees are provided training to enable them to undertake their role with confidence. Policies within this Code of Business Conduct are referred to within the Company Employee Handbook and Intranet.



5. Assets, Confidentiality & Privacy

5.1 Protecting Company Assets & Data

Employees have a responsibility to only use assets to discharge their duties and to protect Premier Paper Group's assets against theft, loss, abuse, unauthorised access, or disposal.

We must all protect assets including facilities, property, equipment, vehicles, computers and systems, data and information.

5.2 Confidential Information & Privacy

All personal information is important to us, and we are committed to safeguarding and protecting personal data and privacy.

In accordance with GDPR legislation and our own GDPR Compliance statement, we will only use personal data where it is in our legitimate interest to do so and to comply with our legal and regulatory requirements.

We will only collect data we need to give a better experience; to improve and deliver our services; and to meet our responsibilities.

5.3 Using IT Systems & Social Media

The Group's IT Security Policy identifies the businesses approach to reducing risks, the need to protect data and keep it confidential as well as meeting our legal and professional obligations.

Communication with the public is only authorised through official channels including press releases, formal publications, our website (www.paper.co.uk) and our official social media accounts.

The company has a Social Media Policy which sets out guidance on its appropriate use, the risks associated with this as well as explaining that only certain staff are authorised to use it on behalf of the Premier Paper Group. Employees that make use of social media should take care to avoid misunderstandings and respect privacy, confidentiality, and intellectual property.

5.4 Insurance

We utilise the services of an insurance broker to put in place appropriate insurance policies for Premier Paper Group.

From 1 January 2024, our insurance levels are as follows (limit any one contract):

- *Employers Liability £10,000,000 any one claim*
- *Public Liability £10,000,000 any one claim*
- *Products Liability £10,000,000 any one claim and in the Aggregate.*

5.5 Business Continuity & IT Recovery Plan

The Group has a Business Continuity and IT Recovery Plan that outlines various strategies for dealing with different scenarios that may arise.

The plan has been communicated to employees and it has been tested where it was appropriate to do so.



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