



## **Environmental and Corporate Social Responsibility Statement**

### **Introduction**

We are Falconer Print and Packaging Ltd, manufacturers of printed folding cartons. The prosperity of our business and of the communities within which we operate requires a commitment to the sustainable management of our activities. We have developed a policy that affects and enhances all areas of our business. We wish, therefore, to adopt and commit to the principles and practices set out below.

### **Staff/People**

We are committed to the well-being and continual development of our people and to training our workforce, where employees are appreciated, valued and given regular feedback so that each employee has a clear understanding of their role and how they contribute to the business.

We operate a meritocracy, where all employees are recognised and rewarded on the basis of their performance, effort, contribution and achievements.

We expect our employees to act with integrity towards one another and exercise a high standard of business practice and workmanship.

We support diversity, fairness and equal opportunities and aim to involve and consult regularly with employees as to the direction of the business.

### **Customers**

We aim to build long term relationships with all our customers and other stakeholders by understanding their objectives as they evolve over time and meeting their needs.

We aim to give fair value, consistent quality and reliability.

We aim to have the highest professional and ethical standards and will be honest, open and transparent in all our dealings with customers.

### **Suppliers**

We aim to create and maintain strong relationships with key suppliers and contractors.

We aim to choose suppliers that share our ethos in relation to employment practices, quality and environmental controls. This will be communicated to all suppliers and potential suppliers.

### **Health & Safety**

We aim to achieve and maintain the highest standards of health and safety and provide a safe and healthy working environment for all our activities.

We have a current and effective written health and safety policy that is regularly reviewed and updated.

## **Environment**

We have implemented an environmental policy appropriate to our business. Which is set out and contained within our EMS manual.

We are aware of our environmental impact as a business and have taken and continue to take appropriate steps to mitigate that impact, including setting environmental objectives and targets, implementing procedures, and providing training so employees and contractors understand their environmental responsibilities and can seek to improve our environmental performance.

Environmental objectives are established annually and reviewed as management review meetings. Falconer Print and Packaging are committed to these objectives being:

- Monitoring and review performance via management review.
- Ensuring compliance to all our legal and compliance obligations.
- Protecting the environment including preventing pollution.
- Continually striving to improve environmental performance.
- Where possible reducing use of non-renewable energy sources.
- Maximise the efficiency of operations.
- Maximise the recycling of materials.
- Ensure the security and provenance of all controlled waste removal.

## **The Community**

We recognise and understand the significance of the local community within which we operate. We aim to enhance our contribution to the community by being sensitive to the needs of local people and groups and promoting ethical and socially responsible trading.

We actively support and donate to the following charities/non-profit organisations within our community:

Age Concern.

Overgate Hospice.

MNDA

Calderdale Industrial Museum

Hanging Heaton Football Club

## **Director Approval**

This statement has been approved by the company's board of directors, who will review and update it annually.

**Director's signature:**



**Richard Martin – Managing Director**

**Dated: 16.08.2023.**

## **Ethics Policy**

### **Purpose**

Falconer Print and Packaging Ltd ("the Company") is committed to the practice of responsible corporate behaviour.

Through its business practices the Company seeks to protect and promote the human rights and basic freedoms of all its employees and agents.

Further the Company is committed to protecting the rights of all of those whose work contributes to the success of the Company, including those employees and agents of suppliers to the Company.

The Company is also committed to eliminating bribery and corruption. It is essential that all employees and persons associated with the Company adhere to this policy and abstain from giving or receiving bribes of any form.

This policy is non-exhaustive, and all aspects of the Company's business should be considered in the spirit of this policy.

### **Human Rights**

The Company is strongly opposed to the use of slavery in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.

The Company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.

The Company will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation's activities.

### **Workers' Rights**

The Company is committed to complying with all relevant employment legislation and regulations. The Company regards such regulations and legislation as the minimum rather than the recommended standard.

No worker should be discriminated against on the basis of age, sex, race, sexual orientation, religion or beliefs, gender reassignment, marital status or pregnancy. All workers should be treated equally. Workers with the same experience and qualifications should receive equal pay for equal work.

No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment as a result of joining, or failing to join, any such organisation.

Workers should be aware of the terms and conditions of their employment or engagement from the outset. In particular workers must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Workers should also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by legislation as a minimum.

The Company does not accept any corporal punishment, harassment or bullying in any form.



**FALCONER**

DESIGN • PRINT • INSPIRE

### **Environmental Issues**

The Company is committed to keeping the environmental impact of its activities to a minimum and has established an Environmental Policy in order help achieve this aim. Copies of the Environmental Policy, contained within the company quality manual are available from Gillian Mitchell, Quality Manager

As an absolute minimum, the Company will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.

### **Conflicts of Interest**

The Company holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees. Conflicts of interest potentially undermine the relationship of the Company with its partners.

In order to help preserve and strengthen these relationships the Company has developed an Anti-Bribery Policy, which provide rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest and at avoiding risks associated with bribery and corruption. Copies of the Anti-Bribery Policy, contained within the company handbook, are available upon request.

All officers, employees and representatives of the Company are expected to act honestly and within the law.

### **Information and Confidentiality**

Information received by employees, contractors or agents of the Company will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given. The Company will at all times ensure that it complies with all applicable requirements of data protection legislation (including, but not limited to, the General Data Protection Regulations 2018) in force from time to time.

### **Shareholders and Investors**

The Company, its officers, employees and representatives are committed to ensuring that no act or omission which is within their power and which would have the effect of deliberately, negligently or recklessly misleading the shareholders, creditors or other investors in the Company occurs.

### **Suppliers and Partners**

The Company expects all suppliers and partners to work towards and uphold similar ethical and moral standards.

The Company will investigate the ethical record of potential new suppliers before entering into any agreement. Further, the Company reserves the right to request information from suppliers regarding the production and sources of goods supplied.

The Company reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this Ethical Policy.

### **Bribery and Corruption**

The Company is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010.

Employees and any other persons associated with the Company such as agents, subsidiaries and business partners are not permitted to either offer or receive any type of bribe and/or facilitation payment.



**FALCONER**

DESIGN • PRINT • INSPIRE

All employees are encouraged to report any suspicion of corruption or bribery within the Company in accordance with the Whistleblowing Policy available from Julie Minshull, Financial Controller.

The Company uses its reasonable endeavours to implement the guidance principles on bribery management that are published, from time to time, by Secretary of State in accordance with Section 9 of the Bribery Act 2010.

If an employee or associated person is found guilty of giving or receiving a bribe, they will be personally criminally liable and may be subject to disciplinary action.

Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

**This policy has been approved & authorised by:**

**Name:** Richard Martin  
**Position:** Managing Director  
**Date:** 16.08.2023.

## **Modern slavery and human trafficking statement:**

### **Introduction**

This statement sets out Falconer Print and Packaging Ltd actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities.

As part of the print and packaging industry, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

This statement covers the activities of Falconer Print and Packaging Limited:

The company produces printed folding cartons inclusively but not exclusively to the following sectors:

- Pharmaceuticals
- Cosmetics
- Toiletries
- Healthcare
- Luxury Giftware
- Beverages
- Haircare
- Petcare

The company supply chain including sub-contractors is monitored by supplier approval, maintained within the company quality manual. ETI base code information is supplied and expected to be adhered to Countries of operation and supply.

The company currently operates in the following countries:

- Predominantly United Kingdom providing services as detailed above.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

### **High-risk activities**

The following activities are considered to be at high risk of slavery or human trafficking:

- There are no activities considered to be of high risk, by the company.

## Responsibilities

Responsibility for the company's anti-slavery initiatives is as follows

- **Policies:** As set out in company handbook and company statements
- **Investigations/due diligence:** Responsibility for investigation and due diligence is with all departmental manager's with ultimate responsibility being directors of the company.
- **Awareness processes:** All staff made aware of the policy as described below.

## Relevant Policies

The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy** The company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact any line manager, director or external agency, as detailed in, but not exclusive to, the company handbook.
- **Employee code of conduct** The company's handbook makes clear to employees the actions and behaviour expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Corporate and Social responsibility** The company encourages all its staff and suppliers to engage in this responsibility as set out in the company corporate and social responsibility statement

## Due diligence

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

## Awareness-raising programme

The company has raised awareness of modern slavery issues by information documents and via the handbook to explain:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the company



In addition to our Modern Anti-Slavery Policy Falconer Print and Packaging follow both the ETI Base Code and FSC Core Labour Requirements. The main points of which are detailed below:

1. Employment is freely chosen / No forced or compulsory labour.
2. Freedom of association and the right to collective bargaining are respected.
3. Working conditions are safe and hygienic.
4. Child labour shall not be used.
5. Living wages are paid.
6. Working hours are not excessive.
7. No discrimination is practised.
8. Regular employment is provided.
9. No harsh or inhumane treatment is allowed.

The provisions of the ETI Base Code / FSC Core Labour Requirements constitute minimum and not maximum standards, and these should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code / FSC Core Labour Requirements are expected to comply with national and other applicable law and, where the provision of law and these standards addresses the same subject, to apply that provision which affords the greater protection.

Falconer Print and Packaging Ltd would expect all of our suppliers/subcontractors to adhere to the above principles and, in addition, would expect all our suppliers to conform to and implement policies relating to ethics, human trafficking and anti- slavery, as detailed.

Falconer Print and Packaging Ltd adhere to an ethics policy, detailing human and worker's rights, and statements referencing modern slavery and human trafficking.

#### **Director Approval**

This statement has been approved by the company's board of directors, who will review and update it annually.

Director's signature:

**Richard Martin – Managing Director**

**Dated: 16.08.2023.**



## A. Product Safety & Quality Management Policy

Falconer Print & Packaging Limited is a supplier of packaging materials specialising in the design, printing, and conversion of paperboard into folding cartons to customer specifications for the pharmaceutical and consumer products industries.

The quality management system described in this Quality Manual includes controls for purchase and receipt of products through to the supply of folded cartons and similar packaging components to customers.

It is the policy of the company to provide its customers with quality, safe, legal products and services which have been manufactured in a secure environment and which are free of contamination and comply with all customer requirements and expectations, and the requirements of interested parties.

This is to be achieved by the implementation of a formal quality system that complies with all the requirements of PS 9000: 2016, BS EN ISO 9001: 2015, BRCGS Global Standard for Packaging Materials and the FSC Chain of Custody Standard.

It is the duty of all personnel to work to the correct standards; attitudes of "Right First Time on Time" will prevail.

Everyone in the company is required: -

- a) To know and understand all the systems and procedures that applies to their duties.
- b) To work to these systems and procedures and bring to the attention of their immediate manager any problems which could have an impact on the quality of products supplied by, or service given by, the company.
- c) All work will be undertaken in a secure, hygienic, clean environment
- d) To continually improve the quality system, so that customer expectations are always achieved or surpassed.

Signed  (Managing Director)

Dated 14/09/2023

## Falconer Print and Packaging Limited Environmental Policy Statement

Falconer Print and Packaging Limited is an environmentally conscious organisation and as such we acknowledge the potential environmental impact that our operations may have on the environment. This policy has been established by top management who fully support its implementation. Top management are responsible for ensuring that it is communicated, understood, implemented, and maintained at all levels within the organisation.

We are committed to the protection of the environment through the prevention of pollution and the continual improvement of our management systems to enhance environmental performance. This has been facilitated through the setting of environmental objectives based on our significant environmental aspects. These objectives will be documented, allocated targets and programmes, and be periodically monitored and reviewed. The results of which are communicated throughout the organisation and available to interested parties where appropriate.

As an organisation, we are committed to ensuring that we:

- Comply with all compliance obligations (legal and otherwise); including codes of practice and guidance produced by regulatory bodies and specific standards, relating to our environmental aspects.
- Provide all employees with the necessary resources, equipment, information, instruction, and training to fulfil the requirements of this policy, commensurate with their role.
- Work towards implementing Environmental Management System (EMS) that complies with the requirements of BS EN ISO 14001:2015, as defined within the scope of our EMS.
- Prevent pollution to the environment and strive to integrate environmental best practice into our business operations.
- Minimise waste to landfill by reducing waste generation and by segregating and recycling waste where economically and operationally feasible.
- Coordinate business mileage so as to maximise fuel efficiency.
- Use energy, water, materials and other natural resources as efficiently as possible, giving particular regard to the long-term sustainability of consumable items.
- Identify, quantify, and reduce our carbon footprint and off-set our emissions through carbon neutral projects.
- Consider the environment throughout the lifecycle of our business activities including the products and services we provide to customers.
- We recognise and understand the significance of the local community within which we operate. We aim to enhance our contribution to the community by being sensitive to the needs of local people and groups and promoting ethical and socially responsible trading. We actively support and donate to the following charities/non-profit organisations within our community: Age Concern, Overgate Hospice, MNDA, Calderdale Industrial Museum, Hanging Heaton Football Club.

This policy will be communicated to all employees and organisations working for or on our behalf. Employees and other organisations are expected to co-operate and assist in the implementation of this policy, whilst ensuring that their own work, so far as is reasonably practicable, is carried out without risk to themselves, others, or the environment.

This policy will be reviewed annually by top management and where deemed necessary will be amended and re-issued. Previous versions will be archived and are available upon request.

This policy statement is displayed on site. It is publicly available upon reasonable request by any interested party.

Signed:



Managing Director on behalf of Falconer Print and Packaging Limited

Date: 18/12/2023

Review Date: 18/12/2024

Issue: 3

# 1. HEALTH AND SAFETY POLICY STATEMENT

It is our policy to provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees, and others who may be affected by our activities as far as is reasonably practicable.

We are committed to the prevention of ill health and injury and to a programme of continual improvement in the reduction of injury and ill health.

We will provide such information, instruction, training and supervision that may be needed for the purposes of complying with any requirements to eliminate or reduce the effect of the hazards created by our undertakings.

We are committed to complying with our statutory health and safety responsibilities and all other responsibilities as prescribed in this policy. We recognise that these legal requirements represent the minimum level of achievement and we will strive to ensure that higher standards are reached. We firmly believe that health and safety objectives are equally as important as other business objectives, and so, each year, we will improve health and safety performance aimed at achieving the principal objectives of:

- Reducing accidents year on year
- Reducing the potential and actual impact on work-related ill health
- Increasing employee knowledge and understanding of workplace risks
- Improving employee involvement in the development of safe systems of work

Sufficient resources and training will be made available to achieve our health and safety objectives. Every process, procedure and working practice will be designed to achieve our objectives and our programme of continual improvement.

Health and safety are responsibilities of management and they rank equally with all other indicators of success. However, we expect every employee to be fully committed to ensuring that we meet our core health and safety objectives.

To ensure that every employee understands their responsibility and is able to work safely we will provide the necessary training. Where required, we will seek expert external advice from a competent person(s).

We recognise the importance of good communication and consultation and so all employees will be involved and consulted in the development of those systems required to meet our objectives.

Employees will be required, as a condition of employment, to observe safe working practices and co-operate with management in carrying out this policy.

This policy and the health and safety management system will be reviewed annually and updated as necessary; any revisions will be communicated to those affected by the changes.

Signature: .....  .....

Richard Martin

Managing Director

Date: ..... 17/08/2023 .....