	Nexus Packaging Ltd	Ref No:	Rev No:
	Title: Anti Bribery and Corruption Policy	POL-05	01

May 2025

### Introduction

Nexus Packaging Ltd operates within the plastic blow moulding industry and is committed to conducting business with the highest standards of integrity, fairness, and transparency.

We maintain a zero-tolerance approach to bribery and corruption across all operations, including procurement, production, distribution, regulatory interactions, and customer relationships.

This policy applies to all employees, contractors, consultants, suppliers, distributors, logistics partners, and any third parties representing our company.

### Purpose of This Policy

This policy aims to:

- Prevent bribery and corruption in all aspects of plastic blow moulding operations.
- Ensure compliance with applicable anti-corruption laws.
- Promote integrity in key processes such as raw material sourcing, equipment purchasing, production scheduling, and quality certification.
- Protect the company's reputation and the trust of customers, regulatory bodies, and industry partners.

### Industry Context: What Bribery Looks Like in Blow Moulding

The plastic blow moulding industry involves complex supply chains, regulatory compliance, and capital-intensive equipment procurement. Bribery and corruption risks may arise in scenarios such as:

- **Raw Material Procurement:** Undisclosed kickbacks for selecting specific resin suppliers.
- **Equipment Purchases:** Incentives offered in exchange for choosing certain machinery or mold manufacturers.
- **Quality Certifications:** Improper payments to inspectors for certification or approval of defective or non-compliant products.
- **Regulatory Inspections:** Offering benefits to influence environmental, safety, or manufacturing compliance inspections.
- **Customer Contracts:** Gifts or payments intended to secure exclusive supply agreements or preferred pricing.
- **Logistics and Customs:** Facilitating payments to speed up customs clearance or transportation.

Any such behaviour is strictly prohibited.

### Our Policy

#### Zero Tolerance


We prohibit all forms of bribery and corruption, whether conducted directly, through intermediaries, or via third parties.

#### Prohibited Conduct

You must not:

- Offer, give, request, or accept bribes, kickbacks, or improper gifts.
- Provide gifts or hospitality intended to influence procurement decisions (e.g., resin suppliers, machine vendors, tooling suppliers).
- Make facilitation payments for customs clearance, freight handling, or regulatory approvals.
- Provide payments, favours, or benefits to influence safety, environmental, or quality audits.
- Manipulate production data, test results, or compliance documentation in exchange for any benefit.

#### Acceptable Conduct

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Reasonable, transparent, and lawful business hospitality is allowed if:

- It is modest and appropriate for a professional manufacturing environment.
- It is not related to any pending decision (e.g., vendor selection, regulatory approval, contract negotiation).
- It complies with local laws and internal approval requirements.
- It is documented accurately.

Examples of acceptable interactions:

- A modest meal during a plant tour.
- Branded promotional items of low value.
- Attendance at a legitimate industry conference or training event.

### Responsibilities of Employees and Representatives

All personnel involved in:

- raw material purchasing,
- machine/tooling procurement,
- maintenance contracting,
- vendor qualification,
- quality assurance or certifications,
- regulatory interactions,

must adhere strictly to this policy.

Responsibilities include:

- Conducting business fairly and without conflicts of interest.
- Declaring any potential conflicts (e.g., personal relationships with suppliers).
- Reporting suspicious behaviour or violations immediately.

### Suppliers and Partners

Suppliers, including resin vendors, mold makers, machine manufacturers, logistics partners, and packaging providers, must agree to comply with this policy as a condition of doing business with us.

### Reporting Concerns

You must report any concerns about bribery, unethical behaviour, or suspicious activity. Examples of reportable situations include:

- A supplier offering personal incentives to influence purchasing decisions.
- An inspector requesting favours in exchange for compliance approval.
- A logistics partner suggesting a "fee" to speed up delivery or customs clearance.

All reports are handled confidentially. Retaliation against good-faith reporting is strictly prohibited.

### Consequences of Violations


Any breach of this policy may lead to:

- Disciplinary action, up to termination of employment.
- Cancellation of supplier or customer contracts.
- Civil or criminal penalties under applicable law.
- Permanent removal from approved vendor or contractor lists.

### 8. Compliance With Laws

Our operations comply with:

- Local anti-bribery and anti-corruption legislation,

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- Environmental and safety regulations applicable to plastics manufacturing,
- International laws such as the FCPA and UK Bribery Act (where applicable).

We expect all employees and partners to follow both the letter and spirit of these laws.

#### Policy Review and Updates

We review this policy periodically to reflect changes in:

- industry regulations,
- manufacturing standards,
- compliance requirements,
- operational procedures.

The most up-to-date version will be published on this website.

Signed:

