



# Perigord

life science artwork solutions



## Corporate Responsibility Policy





## SECTION 1 CORPORATE RESPONSIBILITY POLICY

### PRINCIPLE

Founded in 1976, Perigord strives to be a responsible corporate citizen, wherever we do business. That means we are committed to conducting our business ethically, legally, and in a manner that is fiscally, environmentally, and socially responsible, while delivering sustainable value and strong financial performance.

This policy applies to any activity undertaken by or on behalf of the organisation, anywhere in the world.

### POLICY

Our Corporate Responsibility Policy is built on the following areas of commitment that reflect existing and emerging benchmarks of Corporate Responsibility:

#### Board Commitment

With regards to Board Commitment, the Board of Directors shall:

- » Be accountable as role models to integrate Corporate Responsibility considerations into decision-making.
- » Ensure that Perigord's workforce follow their example.
- » Ensure that appropriate structures are in place to effectively identify, monitor, and manage Corporate Responsibility issues and performance relevant to Perigord's business.

#### Sustainable Value Creation

With regards to Sustainable Value Creation, the Board of Directors will:

- » Strive to maximise value for the company, both present and future value, with high quality assets, strong financial management and sound corporate governance

#### Governance and Business Practices

With regards to Governance and Business Practices, the Board of Directors will:

- » Be committed to maintaining the highest standards of integrity and corporate governance practices to ensure confidence in the governance system.
- » Comply with all applicable laws and regulations in the jurisdictions where we operate and with generally accepted business and accounting principles and practices, the standards of applicable regulatory and self-regulatory organisations.
- » Disclose material and reliable information to all stakeholders in a timely manner, subject to legal



requirements and competitive constraints.

- » Conduct business in an open, honest, and ethical manner.
- » Not tolerate unlawful or unethical behaviour in the workforce, including soliciting, accepting, or paying bribes or other illicit payments.
- » Recognise the importance of protecting all assets of the company including financial, physical, human, information, social, environmental, and reputational assets and we will assess and manage our risks to effectively steward these assets.

### Human Rights

With regards to Human Rights, the Board of Directors will:

- » Support and respect human rights within their sphere of influence.
- » Not take part in human rights abuse, and will not engage or be complicit in any activity that solicits or encourages human rights abuse.
- » Provide for the protection of company personnel and assets by public or private security means.
- » Promote respect for, and protection of, human rights.

### Environment, Health and Safety

With regards to Environment, Health and Safety, the Board of Directors will:

- » Ensure the protection of the health and safety of all individuals affected by board activities and decisions, including in the workforce and the public.
- » Ensure the safeguarding of the environment, operating in a manner consistent with recognised global industry standards in environment, health, and safety.
- » Strive to ensure efficient use, in all our operations, of resources, to minimise our environmental footprint, and to conserve habitat diversity and the plant and animal populations that may be affected by our operations.
- » Strive to reduce our emissions intensity and increase our energy efficiency.

### Community Involvement

With regards to Community Involvement, the Board of Directors will:

- » Set aside a reasonable portion of our earnings for donations to worthy charitable and community causes, sponsorships and community events.
- » Encourage our workforce to volunteer their time in their communities and with not-for-profit and charitable organisations.

- » Strive to understand and align with the values of communities in which we operate.

### Stakeholder Relations

With regards to Stakeholder Relations, the Board of Directors will:

- » Commit to timely and meaningful dialogue with any stakeholders, and to address their legitimate issues and concerns within our sphere of influence.
- » Engage stakeholders clearly, honestly, and respectfully.
- » Notify all directors and shareholders about the Annual General Meeting at which an opportunity is provided to ask questions of the Board.

Reviewed annually by Perigord's Board of Directors.



## SECTION 2 ANTI-COMPETITION

Perigord is committed to adhering to all relevant legislation in regard to Anti-competitive behaviour. Anti-competitive behaviour can come in many forms.

- » Any agreements, decisions or concerted practices that are anti-competitive are prohibited under competition law in both Ireland and the EU. The law does not prohibit all agreements, decisions or concerted practices; only those that is harmful to consumers or rival firms. Those that threaten to raise prices to consumers or restrict output are deemed to be particularly harmful.
- » Competition law has found that some hard-core agreements between competitors are always harmful to consumers. A cartel is an illegal agreement between two or more competitors not to compete with each other. Cartels typically involve a secret conspiracy among many businesses. Those businesses and individuals found guilty of hard-core cartel offences face a number of penalties, including fines and jail sentences.
- » Other agreements that are not considered to be hard-core cartels may breach competition law where they have anti-competitive effects. Examples include; agreements between firms that are not competitors but are related through a chain of distribution, e.g. manufacturers and distributors, distributors and retailers, franchisors and franchisees. Agreements between competitors on research and development, group purchasing and standard-setting can also fall foul of competition law. These agreements may have been entered into for reasons other than the elimination of competition, but may nonetheless breach the law because of their anti-competitive effect.
- » Businesses that have a very large market share and thus hold a powerful position in relation to their competitors and their customers are also prohibited from behaving in certain ways that are anti-competitive. Holding a dominant position is not wrong in itself. Exploiting a dominant position to stifle competition is, however, anti-competitive. Attempting to eliminate your competitors or prevent new competitors emerging, by abusing your dominant position, can be a breach of competition law.

If an employee of Perigord has a suspicion that anti-competitive behaviour is taking place, the CEO or Quality Managers should be contacted.

Employees should provide the Company with their own telephone number(s) and the name, address and contact number for next of kin (or a person to be contacted in the event of an emergency), and should ensure that any change to any of these items is notified in writing to the Company. The Company only holds information that has a legitimate business purpose.

## SECTION 3 ANTI-BRIBERY AND CORRUPTION POLICY

### 1. Introduction

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

### 2. Who is covered by the policy?

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

### 3. What is a bribe?

A bribe is a financial or other advantage offered or given:

- » to anyone to persuade them to or reward them for performing their duties improperly or;
- » to any public official with the intention of influencing the official in the performance of his duties.

### 4. Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with Perigord's ethics policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

### 5. Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

### 6. Donations

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage. Where an employee has failed to attend for work within 15 minutes of the start time, and has failed to contact the Company with an acceptable time of arrival, the Company reserves the right to make alternative arrangements to cover the work.

### 7. Record Keeping

7.1 We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

7.2 All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

7.3 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

### 8. Raising Concerns

Employees are equally invited to speak up about perceived bribery or corruption in the workplace.

If in doubt, employees should consult our whistleblowing policy which provides reassurance and protection for those wishing to disclose something in confidence. We are committed to ensuring no one suffers detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

### 9. Monitoring

The effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under the internal audit process.

If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, please send an e-mail reporting the details to [info@perigord-as.com](mailto:info@perigord-as.com).



## SECTION 4 FAIR TRADEY POLICY

Perigord is committed to dealing with suppliers that meet agreed environmental, labour and developmental standards. Perigord reserves the right to decline trade with Suppliers that do not demonstrate this commitment.

### Application

This Fair Trade Policy defines our minimum standards that all Suppliers must adhere to in order to trade with Perigord.

This policy also applies to (not exclusively) sub-contractors, suppliers, manufacturers or organisers of production that in any way form part of the chain of supply to Perigord.

Suppliers are responsible for ensuring all their sub-contractors and suppliers (including labour, materials or goods and services) used in relation to products provided to Perigord comply with this Fair Trade Policy.

Methods of production used by Suppliers must not involve exploitation or endanger health and safety of any persons or the environment. Perigord regards exploitation of children as especially unacceptable and reserves the right not to trade with Suppliers who are at variance on this issue.

### Obeying Legal Requirements

Perigord requires all Suppliers to fully obey the laws of the countries in which they function. This includes (but not exclusively) all laws related to employment, safety, and the environment and business operations. All standards outlined in Perigord's Fair Trade Policy are expected to be followed in addition to relevant local legislation.

Perigord will only do business with Suppliers who comply with the standards below:

### Employment

#### *Child Labour*

Suppliers shall not use child labour. Due to their vulnerability, Perigord believes that children deserve extra protection from exploitation. Children should have the opportunity, where possible, to participate in an education up to the compulsory age limit deemed by local laws. Work should not interfere with a child's education. Perigord supports participation in legitimate apprenticeship or trainee programs to educate and assist students under school-leaving age (e.g. 15-16 year olds) and legitimate casual work where appropriate, providing the work is light in nature, is performed in safe conditions and does not involve exploitation.

#### *Forced/Compulsory Labour*

The decision to work must be freely chosen by all workers. Suppliers shall not use compulsory or involuntary labour, slavery or debt bondage. Workers must be genuinely free to terminate their employment at any stage with reasonable notice.



### Appropriate Pay and Benefits

The Supplier must set out in writing for its workers clear terms of employment, including wages, benefits and conditions for a regular working week. Workers must be paid at or above the local legal minimum wage for the work performed. The Supplier must not use contracts, trial periods or other arrangements to avoid legal obligations for pay and conditions.

### Hours of Work

Ordinary hours of work shall be consistent with local legislation. All overtime must be voluntary and without coercion and should be duly paid in accordance with the agreed conditions of employment and local laws.

### Discrimination and Harassment

Suppliers will not use (either actual or implied) any physical, sexual, emotional forms of harassment, abuse, discipline or intimidation with any of their workers.

Suppliers are to avoid using discriminatory words, actions or behaviour. A worker's ability to do the job should determine their employment and all associated conditions, rather than discrimination based on non-work-related factors, such as race, religion, gender, personal situations or beliefs.

Workers must not be disadvantaged or prevented from forming or joining communities which raise issues relating to mutual protection and dignity in wages and working conditions.

### Environment, Health & Safety

Suppliers will provide a clean and safe workplace, including providing plant, equipment and work processes that do not pose a risk to the health and safety of their workers. Staff must also receive adequate training and supervision to ensure their safety.

Of specific concern with regard to worker safety is the provision of adequate emergency facilities such as:

- » appropriate fire fighting equipment maintained and available on-site,
- » a sufficient quantity of operating, clearly marked emergency exits which are not locked or obstructed.

Other important safety standards include:

- » Machinery must have appropriate guarding to ensure safety of workers.
- » Appropriate Personal Protective Equipment (PPE) must be made available to workers at no personal cost.
- » Suppliers shall provide clean toilets, clean drinking water and, if appropriate, hygienic kitchen facilities to its workers.
- » Any worker accommodation provided by Suppliers should be adequate for the number of occupants, as well as in a clean and safe condition.



## Environmental standards

- » Perigord requires Suppliers to comply with all applicable local and national environmental laws, and to endeavour to meet relevant international environmental standards.

## Business Ethics

Perigord values and promotes a high standard of honesty, integrity, respect, fairness and professionalism in their business ethics. We also expect our Suppliers to follow equivalent standards in their operations. Bribes, favours, inappropriate gains or other illegal or improper payments, whether in cash or otherwise, are strictly forbidden, whether or not they are offered with the intention of securing trade with Perigord.

## Implementation and Monitoring of the Fair Trade Policy

Perigord (and its representatives) reserves the right to visit Supplier factories or facilities with or without prior notice to ensure adherence to this Policy. Breaches of this policy will be registered with the Supplier's management for investigation and action as appropriate.

If deemed appropriate, action taken by Perigord may include ceasing trade with the relevant Supplier.



## ABOUT PERIGORD

Perigord are specialists in the provision of artwork and labelling outsource services and management solutions to the Life Science Industries globally. Perigord's unique combination of offerings and technical expertise, coupled with our ability to continually deliver Right First Time artwork, offers the Life Science Industries the perfect solution for outsourced artwork production.

Perigord's flagship software product GLAMS (Global Artwork Management Software) is a web-based Life Science Artwork Management Solution, developed and designed to control and manage artwork through the artwork lifecycle.

