

***Rely on us.<sup>SM</sup>***

***Flint*Group**  
**Code of Conduct**  
2024





# Our Core Values



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## Preamble to Flint Group Code of Conduct

The purpose of this Code of Conduct is to set forth Flint Group's general standards concerning ethical and legal conduct. **The Code of Conduct provides a framework to help guide us make the right decisions when working with current and potential customers, suppliers, distributors, agents, competitors, authorities, governments, the media, and any other third party we work with.** This Code of Conduct is supplemented with more detailed policies and procedures addressing specific areas of compliance.



### A message from our Chief Executive Officer

"Thank you for taking the time to read Flint Group's Code of Conduct in full."

I believe that Flint Group makes a meaningful contribution to society by offering sustainable products and services to the Packaging and Printing industry, in a compliant way.

In a quickly evolving and complex world, ethical business conduct matters more than ever.

I am proud to lead a company that has a long history of high ethical business practices. **Our Code of Conduct demonstrates our commitment to high standards and always to operate the business in a sustainable, ethical and compliant way.**

**All of us need to take personal responsibility and act in accordance with the law, our corporate policies and guidelines and our core values.** Please familiarise yourself with our Code of Conduct and always refer to it in case of doubt. If you see or suspect misconduct, please report it without fear of retaliation.

The Code of Conduct is for all of us - employees, partners, suppliers, distributors and agents - anyone who works for, with, or on behalf of Flint Group. By acting in accordance with our Code of Conduct you are protecting our company's reputation and demonstrating our values. Our dedication to doing the right thing will make a difference to our employees, our communities and the long-term success of our company.

**Pepyn Dinandt**  
CEO



# About the importance of our Code of Conduct (Q&A)



## Why do we have a Code of Conduct?

Flint Group's Code of Conduct outlines our commitment to acting in accordance with the law, our corporate policies and guidelines and our core values. If you are unsure about what to do in a specific situation, refer to the relevant section of this Code of Conduct. It will guide you and help you to make the right decision. In the event that you are still hesitant, please contact your manager, HR or the Compliance Department.

Flint Group is totally committed to ethical business practices, personal integrity and compliance with the Code of Conduct and all applicable laws. Flint Group's reputation for acting responsibly plays a critical role in our success as a business.

## Who must follow our Code of Conduct?

All employees, contractors, distributors, and agents and anyone else who represents Flint Group. Our Code is supplemented with a Supplier Code of Conduct (for more information: <https://www.flintgrp.com/en/codeofconduct/>)

## What are the key areas covered by our Code of Conduct?

The Code of Conduct is divided in 7 sections:

- ① **Health, Safety & Environment**
- ② **Respect for fundamental rights**
- ③ **Business conduct**
- ④ **Dealings with partners**
- ⑤ **Confidential information and data safety**
- ⑥ **Illegal practices**
- ⑦ **Ethical advice and reporting violations**

## What should I do if I suspect misconduct?

Flint Group is committed to honest, ethical and legal business conduct.

The Flint Group Assurance Hotline provides a way for individuals to raise concerns about malpractice or possible violation of the law,

ethics or company policies – without fear of reprisal.

All matters are carefully reviewed and investigated with the highest discretion. All reports are handled confidentially. Should you become aware of conduct that appears to violate the law, the Code of Conduct or Flint Group's policies, you have a responsibility to report it using one of the reporting mechanisms set out in Section *"Ethical advice and reporting violations"*.

Flint Group treats all breaches of the Code of Conduct seriously, no matter how small or insignificant the breach might seem. All alleged breaches or violations are investigated promptly, and any proven non-compliance may carry severe disciplinary consequences, including termination of employment or a third party may see their contract terminated or not renewed. If Flint Group determines that the breach of the Code of Conduct may also be a breach of applicable law, the issue will be investigated and, where appropriate, referred to the relevant authorities.







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**Flint** Group



Global **Colour** Centre



# HSE

Flint Group is committed to providing all employees with a safe and healthy workplace.

Therefore, Flint Group expects every employee to comply with all applicable safety, health and environmental laws and regulations, as well as all the company's Safety, Health and Environmental Policies (whichever is the higher standard).

We expect every employee to be responsible for his or her own safety and behave in a safe manner.

In addition, we request that employees speak to their colleagues immediately whenever they see anyone acting unsafely. Zero workplace injuries is a fundamental Flint Group goal. All workplace activities will use this standard as a guiding principle when considering new or current work processes, product development and design.

We will provide the necessary systems, tools and training to ensure our employees are able to do their job and conduct business in a safe and healthy manner.

Flint Group will only work with suppliers and contractors that have all appropriate permits and approvals. **We expect our suppliers and contractors to share our views relative to workplace health, safety and protection of the environment and follow our standards.**

Flint Group will strive to reduce pollution from discharges and emissions.

We will actively conserve energy throughout the life cycle of our products and improve our overall environmental performance, including water consumption, waste reduction and recycling. Flint Group demonstrates environmental responsibility by minimizing any adverse effects from its operations on the community, the environment and on natural resources. All required permits, registrations and reporting are obtained, maintained and kept current.

Flint Group is a signatory to the **UN Global Compact** and operates within the spirit of the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption.

The UN Global Compact and its principles are integrated into the strategy, culture and day-to-day operations of our company. Flint Group engages in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.



# RESPECT

for fundamental rights

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**Flint Group is committed to upholding the human rights of workers and to treating them with dignity and respect.**

#### **a) Forced labour**

Flint Group condemns forced or compulsory labour, and complies with the respective laws of each country in which it operates.

#### **b) Child labour**

Flint Group recognises the rights of every child to be protected from economic exploitation, and complies with the laws of each country in which it operates in regards to minimum hiring age for employees. Beyond this, Flint Group abides by the UN Declaration on the rights of the child at all times.

<https://www.unicef.org/child-rights-convention/convention-text>

#### **c) Employment Laws and Minimum Policy Standards**

**Flint Group complies with applicable employment laws, regulations and industry standards in each country in which it provides employment.** Flint Group's

employees shall be provided with fair wages for the services that they provide. Flint Group fully expects that employees around the world do not suffer from any form of harassment, bullying, intimidation, disrespectful treatment, threatening working environments, etc.

Flint Group shall not interfere with employees' freedom of association and collective bargaining that are in accordance with applicable laws and regulations.

#### **d) Anti-Discrimination, harassment and diversity**

**Flint Group recognizes the dignity of each of its employees, and the right to a workplace free of harassment, intimidation or abuse of any kind.** Flint Group strictly prohibits any kind

of harassment, intimidation, bullying or abuse of any employee, including through the threat of physical punishment or disciplinary action, or physically, sexually, racially, psychologically, or verbally. Decisions on hiring, salary, benefits, advancement, termination or retirement are based solely on the employee's ability to do the job. Flint Group does not discriminate against anyone on the basis of

race, colour, religion or belief, national, social or ethnic origin, age, physical, mental or sensory disability, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, family or parental status, or any other status protected by the laws or regulations in the locations where we operate and not related to the job.

#### **e) Equal opportunities**

Flint Group offers equal opportunities in employment and pay for everyone regardless of race, colour, religion or belief, national, social or ethnic origin, age, physical, mental or sensory disability, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, family or parental status, or any other status protected by the laws or regulations in the locations where we operate and not related to the job.

#### **f) Freedom of Association and Collective Bargaining**

Freedom of association and collective bargaining are two fundamental rights.

Flint Group workers and employers, without distinction whatsoever, shall have the right to establish and, subject only to the rules of the organisation concerned, to join organisations of their own choosing without previous authorisation.

Negotiations can take place between an employer, a group of employers or one or more employers' organisations, on the one hand, and one or more workers' organisations, on the other, for: (a) determining working conditions and terms of employment; and/or (b) regulating relations between employers and workers; and/or (c) regulating relations between employers or their organisations and a workers' organisation or workers' organisations.

<https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/lang-en/index.htm>

“ Flint Group offers a wide range of training courses and development programmes in order to enable every employee to reach their full potential. ”

#### g) Talent and human capital development

Flint Group strongly believes in developing its employees. Flint Group offers a wide range of training courses and development programmes in order to enable every employee to reach their full potential. Furthermore, Flint Group has a capability and talent review process to identify additional opportunities and promote from within the organisation.

#### h) UN Universal Declaration of Human Rights

Flint Group respects and supports the spirit of the United Nations' several conventions:

- Universal Declaration of Human Rights.
- International Covenant on Civil and Political Rights.
- The International Covenant on Economic, Social and Cultural Rights.
- The Convention on the Prevention and Punishment of the Crime of Genocide.
- The Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment.
- The International Convention on the Elimination of All Forms of Racial Discrimination.
- The Convention on the Elimination of All Forms of Discrimination Against Women
- The Convention on the Rights of the Child.
- The Convention on the Rights of Persons with Disabilities.
- The United Nations Declaration on the Rights of Indigenous Peoples.
- The Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities.
- United Nations Convention against Transnational Organised Crime and the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime

#### i) International Labour Organization

Flint Group respects and supports the spirit of the International Labour Organization Constitution, which objective is to implement labour standards, develop policies and devise programmes promoting decent work for all women and men.

- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- The International Labour Organization's Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87).
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98).
- Forced Labour Convention, 1930 (No. 29) and its 2014 Protocol.
- Abolition of Forced Labour Convention, 1957 (No. 105).
- Minimum Age Convention, 1973 (No. 138).
- Worst Forms of Child Labour Convention, 1999 (No. 182).
- Equal Remuneration Convention, 1951 (No. 100).
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111).

#### References

<https://www.un.org/en/about-us/universal-declaration-of-human-rights>

<https://www.ilo.org>

<https://www.ohchr.org>

<https://www.un.org>

<https://www.unodc.org>



**United Nations**



International Labour Organization



# BUSINESS conduct



### a) Use of Flint Group Assets

Flint Group's assets are to be used only for the legitimate business purposes of Flint Group as defined in the IT policies and only by authorised employees or their designees.

This includes both tangible and intangible assets. Some examples of tangible assets include office equipment such as phones, copiers, computers, furniture, supplies and production equipment. Internet and e-mail are provided to Flint Group employees for business use and not for personal use. In addition, users are bound by the requirements of applicable laws and contractual commitments including without limitation, the acceptable use policy of Flint Group's network and Internet Service Provider(s).



### b) Recording Transactions and Flint Group Records

All Flint Group books, records, accounts, funds and assets must be maintained to reflect fairly, accurately and in the appropriate accounting period that the relevant transaction occurred, the underlying transactions and disposition of Flint Group business in reasonable detail. No entries will be made that intentionally conceal or disguise the true nature of any Flint Group transaction. In this respect, the following guidelines must be followed:

- ❶ ***No undisclosed, unrecorded, or "off-book" funds or assets should be established for any purpose.***
- ❷ ***No false or fictitious invoices should be paid or created.***
- ❸ ***No false or artificial entries should be made or misleading reports issued.***
- ❹ ***Assets and liabilities of Flint Group shall be recognized and stated in accordance with Flint Group's standard practices and Generally Accepted Accounting Principles, as amended from time to time.***

### c) Political Involvement

It is Flint Group's policy that **no corporate funds can be used to make political contributions of any kind to any candidate or political party.**

This prohibition covers not only direct contributions, but also indirect assistance or support of candidates or political parties through the purchase of tickets to special dinners or other fundraising events, and the furnishing of any other goods, services or equipment to political parties or committees. No person may be reimbursed directly or indirectly by Flint Group for any political contribution or for the cost of attending any political event.

***Political lobbying of any sort is prohibited.***

### d) Charitable contributions & Sponsorship

Charitable contributions are a way of contributing to worthy causes in money and in kind. **We make donations to promote education, culture, social, humanitarian and environmental projects and encourage community engagement.**

Charitable contributions are made in a transparent manner in strict accordance with Flint Group ethical values and the law and are subject to an approval process. Flint Group does not expect any business advantage in return.



Sponsorships provide a way of strengthening the Flint Group brand. They differ from charitable contributions as they intend to serve Flint Group business interests and obtain a specific benefit, e.g. advertisement or public relation objectives. Sponsorships follow an internal strict and transparent approval process. Sponsorship activities are only approved if they reflect legitimate business objectives and are aligned with our values.

#### e) Official Investigations

Prosecutors and government regulators have broad authority to investigate possible violations of law, request documents and seek interviews or testimony of Flint Group employees.

Flint Group's policy is to cooperate with reasonable requests of government investigators. At the same time, Flint Group is entitled to all the safeguards provided by law for the benefit of persons under investigation or accused of wrongdoing, including legal representation. If a representative of any government or government agency contacts any Flint Group employee or requests access to data or documents for the purposes of an investigation, the employee shall immediately notify their supervisor and Flint Group's Legal Department, and respond according to Flint Group's customary business practice.

#### f) Conflicts of Interest

A conflict of interest occurs when a person is confronted with choosing

**“Conflicts of interest have the potential to damage client relationships and Flint Group's reputation, as well as expose Flint Group to legal consequences.”**

between the duties and demands of their position and their own private interests. A conflict of interest may give rise to a risk of bribery – actual, potential or perceived.

Conflicts of interest have the potential to damage client relationships and Flint Group's reputation, as well as expose Flint Group to legal consequences.

Communication and vigilance is therefore imperative to ensure that you do not put yourself in a situation where your personal interests or relationships conflict with ours or those of our clients. You must be professional, unbiased and impartial when you represent us and work with our clients.

Conflicts of interest may involve, among other things:

- Outside work or employment;
- An outside business relationship with, or interest in, a customer or competitor;
- A business relationship on behalf of Flint Group with any person who is a relative or personal friend, or with a company controlled by such person(s);
- A position where you have influence or control over the compensation of any person who is a relative or romantic partner; or
- An acceptance of personal benefits, such as something more than a modest gift or entertainment, from a person or organization dealing, or expecting to deal, with Flint Group in any type of business transaction.



- Employees are under a continuing obligation to disclose to their supervisors any situation that presents the possibility of a conflict of interest between the employee and Flint Group. Disclosure of any potential conflict through advance notice to the employee's manager is the key to remaining in full compliance with this Code.

#### g) Trade Controls

Flint Group personnel should pay particular attention to the laws that govern international trade, including export controls, import requirements and economic sanctions law (together, "trade controls").

##### *Trade controls typically cover:*

- Exports or re-exports to a prohibited or sanctioned country, entity or individual without the appropriate license or authorization;
- Imports or property dealings from, or originating in, a sanctioned country;
- Imports or property dealings with a sanctioned entity or individual;
- Business dealings with a sanctioned country, entity, or individual;
- The transfer of restricted products, software, technical data or technology without a license by email, download or disclosure to people in or from sanctioned countries;
- The prohibition of engaging in certain boycotting activities – e.g. U.S. anti-boycott laws.

Some of the countries in which Flint Group operates impose trade restrictions targeting specified countries, entities and individuals. Most countries also periodically impose controls on the export and the end use of certain products, technology, software and services.

The penalties for violating these laws can be very significant. Penalties can include civil or criminal fines, imprisonment, revocation of permits to export, and debarment from working on government contracts. These laws also often apply to persons and activities outside of the country that has passed the law.

**Those working for or on behalf of Flint Group must always act consistently with any applicable trade control laws and regulations.** Therefore, Flint Group will:

- Observe the relevant export and import regulations that govern the shipment of Flint Group's raw materials, products and services, as well as applicable international trade agreements.
- Not conduct business (neither imports nor exports) with countries that are subject to trade embargoes and/or economic sanctions that are applicable to Flint Group and/or its business; and
- Never expand business into a foreign country where Flint Group has not previously done business without assessing risk and discussing it with the management and Flint Group's Legal and Compliance Departments.





# Dealings with **PARTNERS**





**Beyond legal compliance, all Flint Group employees and Third Parties are expected to observe high standards of business and personal ethics in the discharge of their assigned duties and responsibilities.**

**This requires the practice of honesty, integrity and sound judgement in every aspect of dealing with other Flint Group employees, the public, the business community, customers, suppliers, competitors, and governmental and regulatory authorities.**

#### **a) Dealing with Business Partners and Suppliers**

Flint Group business partners and suppliers agree to align with the values outlined in this Code of Conduct and are expected to follow the highest standards of business conduct. They all comply with the values mentioned in this Code and/or in the Supplier Code of Conduct.

Flint Group performs due diligence on its third party intermediaries (“TPIs”) and only conducts business with reputable and qualified TPIs who act within integrity and in compliance with all applicable laws and Flint Group policies, in particular Flint Group’s Code of Conduct.

#### **b) Dealing with government officials**

A “government official” includes any public official, officer or employee of a government anywhere in the world at any level; government-owned or controlled entities such as universities or utility companies; political party; or public international organisations such as the Red Cross.

Regardless of local practices, Flint Group does not allow under any circumstances the making of “facilitation payments” - i.e., payments to a government official for routine governmental action (such as processing papers, issuing permits, etc.) in order to expedite performance



of duties (i.e. action they are already bound to perform). “Facilitation payments” do not include payments of fees fixed under local law or regulations paid to the local government authority.

Gifts, including any form of hospitality, cannot be given directly or indirectly to government officials without the prior approval of Flint Group’s Legal Department. Services and favours including the provision of cash, travel or other benefits cannot be given directly or indirectly to government officials under any circumstances.



**“ Flint Group business partners and suppliers agree to align with the values outlined in this Code of Conduct and are expected to follow the highest standards of business conduct. ”**

### c) Gifts, hospitality and entertainment

Gifts, hospitality and entertainment given and received as a reward or encouragement for preferential treatment are not allowed. In certain circumstances, the giving and receiving of modest gifts and entertainment is acceptable. A business meal, for example, can provide a relaxed way of exchanging information. Nonetheless, depending on their size, frequency and the circumstances in which they are given, they may constitute bribes, political payments or undue influence.

Some gifts and entertainment are never acceptable, for example cash or cash equivalents, or any gift or entertainment that would harm our reputation, such as those that are indecent or improper.



### d) Antitrust and Competition Law

Flint Group is committed to the principles of free and fair competition.

It is our policy to compete vigorously and effectively while always complying with the applicable competition laws and regulations in all countries in which we operate. Accordingly, we must:

- ① **Keep contact with our competitors to a minimum;**
- ② **Not disclose, seek from, or exchange with competitors any commercially sensitive information such as price, contract negotiations, capacity, production costs, commercial strategies or plans, bidding intentions, customers and market share;**
- ③ **Not discuss commercially sensitive information in joint ventures with competitors or potential competitors unless it relates to the specific venture;**

- ④ **Not discuss commercially sensitive information when participating in trade or industry associations; and**

- ⑤ **When selling products to, or purchasing products from, a competitor, only exchange information that is legitimately required to complete the transaction.**

It is illegal to enter into any agreement with a competitor concerning prices, costs, terms, customers, markets, production, business plans or any other matter that could affect competition. An unspoken agreement to fix prices or allocate markets is just as illegal as a spoken or written agreement.

# CONFIDENTIAL

information and data safety



### a) Records & financial integrity

Company records come in many forms: a paper document, a database, an email or instant message, a voice message, a diagram or photograph. All Flint Group records are subject to audit and inspection at any time. It is a crime to knowingly alter, destroy, mutilate, conceal, cover up, or make false entries in a record or document with intent to impede, obstruct, or influence a government investigation.

Financial integrity can be defined as making sure a financial report is correct, consistent, complete and accurate. It involves the application of skill, knowledge and experience within a climate of transparency, openness, high-quality work, avoidance of conflict of interest and high standards of impartiality and professional ethics.

### b) Confidentiality

**Flint Group believes its proprietary information is an important asset in the operations of its business, and prohibits the unauthorised use or disclosure of this information.** Flint Group occasionally receives confidential information from other companies under Confidentiality Agreements, and employees should protect that information as required by the Agreement. Flint Group respects the rights of other companies to their proprietary information, and requires its employees to fully comply with both the spirit and the letter of applicable laws and regulations protecting such rights.

All non-public information regarding Flint Group or its businesses, employees, customers and suppliers is confidential.

Confidential information may only be used for the business purpose intended. Confidential information may not be shared with anyone unauthorised outside of Flint Group, including family and friends, or with other employees who do not need the information to carry out their duties. Flint Group employees may be required to sign specific confidentiality agreements in the course of their employment at Flint Group, wherefore the non-exhaustive

list of confidential information hereinafter may provide guidance but shall not be deemed conclusive as regards content or scope.

The following is a non-exhaustive list of confidential information:

- Flint Group's current and forecast trading results, before they have been made available in the public domain by Flint Group.
- Trade secrets, which include any business or technical information, such as formula, programme, method, process, technique, compilation or information that is valuable because it is not generally known.
- All rights to any invention or process developed by an employee using Flint Group facilities or trade secret information, resulting from any work for Flint Group, or relating to the Flint Group's business.
- Customer details, tenders and pricing and conditions.
- Supplier details, tenders and pricing and conditions.
- Production processes, capacities and output.
- Proprietary information such as customer lists and customers' confidential information.
- Any and all public and media communications involving Flint Group (other than pure trade announcements) must have prior clearance from the Chief Executive Officer.

### c) Data protection & personal data security

**Flint Group is committed to ensuring the highest level of trust and security standards in every area throughout the organization.**

Legal requirements and technological development increase the need to ensure effective protection of personal data privacy.

We all need to understand our responsibilities and obligations when processing personal data.



Flint Group ensures that the personal data being processed is managed lawfully and kept confidential and secure, from the time it is collected, through its transfer to and from customers or third parties, until it is destroyed when they are no longer current or needed.

It is essential for Flint Group to protect personal data from loss by ensuring safe storage and proper processing. We expect all employees to act with due respect, integrity and apply the necessary safety standards.

#### d) Intellectual property

Flint Group respects the Intellectual Property (“IP”) rights of others and we expect employees to also personally respect them by purchasing only legitimate goods and services. Never knowingly purchase or use counterfeit goods on the company’s behalf, no matter what the price advantage may be. Never illegally download or transfer products, such as movies, music, or software using company equipment. Doing so could put Flint Group at risk.

#### Intellectual Property law has three main branches: patents, trademarks, and copyright.

**Patents** grant an exclusive right to the first person to invent a new product or process, or a new technical solution. Patents protect the patent owner for a limited period, generally 20 years. Patents promote innovation by providing the inventor with the incentive of profit through exclusive promotion. Patent laws also protect trade secrets, defined as any information that is not generally known in your industry.

**Trademarks** protect a company’s “good will” – the investment they have made in their name or brand, or the distinctive sign that conveys the company name or product to the public.

**Copyright** protects the creative work of a particular author, governing the right to copy, publish, perform in public, translate, or communicate a work to the public via telecommunications. Copyright applies to all original literary and artistic works (including computer software).

#### e) Social media

**While using social media accounts, Flint Group expects its employees to respect their audience, comply with all applicable policies and guidelines, and ensure that their views cannot be mistaken for representing the views of the company.** Disclosure of our Flint Group’s confidential information, such as trade secrets, financial information, legal proceedings, marketing plans or private information about customers, co-workers or suppliers is prohibited. Flint Group employees are not allowed to reference clients, partners or suppliers without their approval.





# ILLEGAL practices

**Flint Group requires its employees to report any known or suspected fraud or other illegal practices involving Flint Group and/or those working for or on behalf of Flint Group.**

## **a) Money Laundering**

Money laundering is a process that criminals use in an attempt to hide the illegal source of their income. By passing money through complex transfers and transactions, or through a series of businesses, the money is “cleaned” of its illegitimate origin and made to appear as legitimate business profits. Those working for or on behalf of Flint Group must never allow themselves to be used or exploited as a vehicle for money laundering, funding criminal activities or supporting illegal activities.

## **b) Fraud**

Any behaviour or transaction that seeks to divert or appropriate financial or other benefits to you or to a third party, including misappropriation of Flint Group’s assets or those of a partner, are not only a breach of this Code and the terms of your engagement, but a criminal act in most jurisdictions. Flint Group will investigate and, as appropriate, report any fraudulent or illegal practices to the relevant authorities, in addition to exercising any other rights it may hold.

## **c) Commercial bribery**

Flint Group does not tolerate the offering, making, requesting or receiving of payments or payments in kind (gifts, favours, etc.),

whether to influence individuals to award business opportunities to Flint Group, make a business decision in Flint Group’s favour, has the intention that an improper act should be performed, or otherwise.

Commercial bribery for the purpose of continuation of existing business or to obtain any new business is not acceptable and is prohibited in all cases.

We must also be aware that commercial arrangements, such as consultancies or commission agreements, and donations to charitable contributions can potentially be used as a cover for bribery. All third party arrangements and charitable contributions can only be made in accordance with Flint Group policies.

Such actions, in addition to violating the Code of Conduct, may also violate local laws and subject the employee to fines and/or imprisonment. However, arms-length commercially negotiated purchase prebates, rebates, bonus payments or product finance arrangements are lawful.

# ETHICAL ADVICE

## and reporting violations

### a) Speak-up

**Flint Group's zero tolerance policy on retaliation goes hand in hand with our belief that speaking up is always the right thing to do.**

All reports are taken seriously. Each allegation is investigated and, if substantiated, resolved through appropriate corrective action and/or discipline.

Flint Group is committed to developing a harmonious, productive and safe workplace. A cornerstone of Flint Group's philosophy is respect and mutual trust. Intimidation, harassment, and threats of or acts of violence are not tolerated.

### b) Retaliation

Flint Group encourages openness. The company is wholeheartedly supporting employees who legitimately raise concerns, even if they turn out to be unfounded. Flint Group will, under no circumstance, tolerate retaliation against anyone who speaks up in good faith to report concerns about behaviour that does not comply with the company's Code of Conduct, its policies or the law.

### c) Integrity Assurance Hotline

**Flint Group remains completely dedicated to fostering the highest level of ethics and integrity across our organisation. We expect all employees and partners to do business in a respectful, honest and ethical manner.** However, if you ever have a genuine concern of inappropriate business practice. EthicsPoint can help you report those concerns safely and reliably.

EthicsPoint is a confidential service for employees and third parties that is managed by an external company, independent of Flint Group, with trained staff able to deal with calls in local languages. Ethics Point is available via telephone, email or internet, 24 hours a day, 7 days a week and provides safe and confidential avenues to report misconduct.

Reports are entered directly to an EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available anonymously (if requested by the reporter) only to specific individuals within the company who are charged with evaluating and investigating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

**Visit our web-based hotline portal to learn more.**

**[www.flintgrp.ethicspoint.com](http://www.flintgrp.ethicspoint.com)**



We bring  
**colour**  
to the world

**Flint**Group



# **Flint**Group



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