



Fragrance Oils

COMPANY POLICY AND PROCEDURE

POLICY SCHEDULE

Policy Title	Business Code of Conduct and Ethics
Policy Owner	Chief Executive – Martin Potts

Policy versions and Reviews

Version Number	Implemented	Reviewed	Signature
1	May 2006	-	
1	-	January 2017	
1	-	January 2018	
2	January 2019	-	

(This policy document will be reviewed at least annually and is held on our Company Website).

This policy does not form part of your contract of employment and may be revised at any time at managements discretion



Business Code of Conduct and Ethics

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ADDITIONAL POLICIES AND GUIDELINES

All policies listed below are available on the Company Intranet. Those marked with an * are also available on the Company's Website. These policies are available as hard copies upon request.

Alcohol & Drugs	Fraud & Money Laundering
* Anti-Bribery & Corruption	GDPR
Anti-Slavery	Health & Safety
Bullying and Harassment	Hospitality & Gifts
Business Expenses	Human Rights
CCTV	* Privacy – Company
Confidentiality	Privacy – Employee
* Criminal Finance Act & Tax Evasion	Procurement
Dress/Uniform & Appearance	Recruitment & Employment
Electronic Communications	Security
Email & Intranet	* Modern Slavery Statement
Environment	Social Media
Equality & Diversity (Equality Act 2010)	Time and Attendance
* Ethical Trading	Whistleblowing



Business Code of Conduct and Ethics

POLICY STATEMENT

This Policy applies to all companies within the Fragrance Oils Limited Group of Companies ("Fragrance Oils") and all its business partners and representatives.

Fragrance Oils believes that it is important for the Company and its employees to maintain high standards of ethics and integrity in carrying out its business in order to maintain the respect and trust of our customers and suppliers and to preserve its reputation in the marketplace.

This Code of Conduct ("the Code") sets out those standards of behaviour by which all employees are bound. It provides guidelines on a wide range of situations that directly reflect on the Company and refers to the relevant supporting policies situated on the Company Intranet and Website.

The procedure will be closely monitored and will be developed as necessary to ensure that it meets the needs of the Company.

GENERAL CODE OF CONDUCT

The Purpose and Principles of the Code

The Code describes the principles by which Fragrance Oils expects its employees to conduct their business. It sets out the required standards of behaviour for carrying out its business. The Code deals with a wide variety of issues and situations relating to workplace conduct, but it is not intended to be exhaustive.

These principles are as follows:

- we comply with laws and regulations;
- we reject bribery and corruption and avoid being compromised by gifts and entertainment;
- we avoid conflicts of interest;
- we respect the confidentiality of personal, corporate and commercial information;
- we promote diversity and equality and treat people fairly and with respect;
- we maintain a safe and healthy environment for people to work in and are proactive in managing our responsibilities to the environment;
- we support those who have any suspicions of any misconduct, malpractice, illegal or unethical behaviour and report their concerns in confidence through the appropriate channels.

Fragrance Oils will aim to trade ethically. To implement this, we will:

- not take advantage of lower employment or manufacturing costs in developing countries;
- adhere to any Government recognised trading sanctions;
- refuse to work with any client or prospective client which we have reason to believe exploits humans, animals or the environment unfairly.

These principles are outlined in more detail in the Code below. Several of the principles and standards outlined in the Code are supported by more detailed specific policies on the Company Intranet/Website.



Business Code of Conduct and Ethics

Who must follow the Code?

Company operations and employees of Fragrance Oils are subject to the laws of countries and other jurisdictions around the world and are expected to comply with the Code and all applicable government laws, rules and regulations.

The Code applies to all employees of the Fragrance Oils Ltd Group of Companies employed on a permanent or temporary basis, and all of its business partners and representatives.

What is expected of everyone?

Understand the Code. Comply with the Code and the Law wherever you are. Use good judgement and avoid even the appearance of improper behaviour. If ever in doubt, seek immediate guidance from your Director or the Personnel Director.

Everyone in our business has particular responsibilities, including:

- leading by example;
- promoting a culture of Ethics and Compliance;
- promoting good ethical behaviour and business conduct including complying with all laws and regulations;
- promoting an environment where employees feel confident and able to raise ethical concerns and that they are taken seriously and followed-up;
- always acting to stop violations of the Code or the Law;
- never encouraging or directing employees to achieve business results at the expense of ethical conduct or compliance with the Code or the Law.

Zero Tolerance

While this Code gives guidance to employees in certain situations, there are specific areas where Fragrance Oils has a policy of zero tolerance. These are;

- unsafe, illegal or unethical working practices;
- violence and aggression;
- discrimination, bullying and harassment;
- bribery and corruption;
- retaliation or action against anyone who speaks up and, in good faith, reports a wrongdoing.

Whistleblowing

Whistleblowing is the reporting of suspected wrongdoing at work by an employee, the Company or any of its business partners and representatives. Our Whistleblowing policy exists to help you speak up in situations where you suspect dangerous, illegal, harmful or fraudulent activity is or has taken place or is likely to be taking place, or when you or your colleagues are being treated unfairly. Fragrance Oils conducts its business to the highest standards of integrity and honesty, we expect you to maintain these same standards in everything you do.

The Company has a separate [Whistleblowing Policy](#) in place.



Business Code of Conduct and Ethics

Breaches of the Code

This Code of Conduct has been drawn up to provide guidance on conduct for employees of Fragrance Oils. For the avoidance of doubt, it is not a contractual document and Fragrance Oils reserves the right to amend it at any time. The Code will be subject to regular review, particularly in the light of new and relevant legislation.

Any breach of the Code will be considered a disciplinary matter, which could result in disciplinary action up to and including dismissal.



STANDARDS OF BUSINESS PRACTICE

TOTAL INTEGRITY IN THE COMPANY

Fragrance Oils is committed to maintaining a standard of integrity in all countries where we operate. We believe in fair trade practices, in human rights, in sustainable business practices to protect the environment.

Anti-Bribery and Corruption

Fragrance Oils operates a zero tolerance policy to bribery and corruption in whatever form it takes.

The Company does not allow the direct or indirect offer, payment, solicitation, or acceptance of bribes in any form or improper inducements, including facilitation payments, to secure business or to gain any advantage for either the Company or for any individual. We do not authorise, offer to pay or accept bribes, kickbacks or gratuities; this includes offering or making payments to third parties in situations where there is reason to believe that even a portion of the payment will be offered to someone else for an improper purpose. We actively refrain from any misleading or deceptive accounting or financial reporting practices.

The Company has a separate **Anti-Bribery and Corruption Policy* in place which details the procedures that must be followed to avoid involvement in any situation which might lead to the offer of bribes. The policy makes it clear that any employee is likely to be immediately dismissed and may well have committed a criminal act which could lead to prosecution.

The Company will cease to trade with any agent, customer, distributor or supplier found to be knowingly involved in any kind of corrupt practice.

We expect you to comply with all anti-bribery and corruption-related legislation and to take all reasonable steps to ensure everyone you work with does the same.

Business Contracts

Contracts define our business relationships with customers, suppliers and other third parties with whom we do business. They are an important means of managing risks by setting out each party's obligations, providing clarity as to how the relationship should work and limiting our exposure if things go wrong. It is also critical we fully observe all of our duties and obligations contained in those contracts to preserve the Company's commercial success and maintain its reputation. All business contracts that the Company enters into must be authorised and observed properly.

For further information, you should refer to the Company's Business Contracts guidelines.

Competition

Fragrance Oils complies with all fair competition laws and does not tolerate anti-competitive activity. It is fundamental to the success of the Company that we compete for and win business. Fragrance Oils expects all of its employees to compete in the marketplace in a lawful and ethical manner which allows and respects healthy market competition, abiding by the laws of each country where business is conducted. We are expected to be fair, to act with honesty and to maintain the highest standards of personal integrity with one another and in all business dealings.

* Policy on Company Website



Business Code of Conduct and Ethics

Confidentiality

Fragrance Oils is committed to the maintenance of the highest level of integrity in all its dealings with clients, customers and staff. This extends not only to commercial confidentiality but also to the protection of personal information received in the process of providing a service.

Criminal Finance Act & Tax Evasion

Fragrance Oils has a zero tolerance approach to all tax evasion, whether under UK law or under the law of any foreign country. All employees and associated persons, who undertake business on our behalf, must not undertake any transactions which cause the Company to commit a tax evasion offence, or facilitate a tax evasion offence by a third party.

We are committed to acting professionally, fairly and with integrity in all our business relationships wherever we operate, implementing and enforcing effective systems to counter tax evasion facilitation. At all times, business will be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

The Company has a separate **Criminal Finance and Anti-tax Evasion Policy in place.*

Data Protection and Company Privacy

Fragrance Oils is committed to protecting the privacy of its employees, job applicants, customers, agents, distributors, suppliers and contractors and in complying with General Data Protection Regulations (GDPR) 2018 and the Data Protection Act 2018 that came into force on the 25th May 2018 and replaces the Data Protection Act 1998 (DPA).

Fragrance Oils holds and processes information on its staff and other data subjects for administration and commercial purposes. We will only collect and handle data for “legitimate purposes” and in compliance with the data protection regime above.

The Company has a separate *General Data Protection Policy and * Company Privacy and Employee Privacy Policy in place.*

Fraud & Money Laundering

Fragrance Oils is committed to preventing Fraud and Money Laundering and to developing an appropriate anti-fraud/anti-money laundering culture. The Company has a zero tolerance to fraud and money laundering which can potentially seriously damage the Company’s reputation as well as expose individuals and the Company to legal proceedings. No colleague should knowingly permit the carrying out of any fraudulent act by a business or another colleague in connection with the running of the Fragrance Oils Limited Group of Companies business (“Fragrance Oils”).

Any conduct that could potentially be fraudulent will result in an investigation that could lead to disciplinary action being taken against the offending party, which may result in dismissal. Any concerns should be reported promptly to your Director.

*For further information, you should refer to the Company’s Fraud & Anti-Money Laundering guidelines and *Anti-Bribery & Corruption Policy and *Criminal Finance & Anti-tax Evasion Policy.*

* Policy on Company Website



OUR APPROACH TO CORPORATE GOVERNANCE

We are open, honest and cooperative with our regulators. We ensure that the information we provide to them is accurate and complete. The Board is collectively responsible for the Company's financial and operational performance as well as for promoting the success and sustainability of the business.

The Board fulfils its responsibilities by directing and supervising the Company's strategy and policies.

Compliance with the Law

Fragrance Oils' business, employees (and all others to whom this Code applies) will observe and abide by UK laws and regulations and the laws of each country where business is conducted.

We will comply with all environmental, safety and fair dealing laws and will be ethical and responsible when dealing with the Company's finances, products, partnerships and public image.

Financial and Non-Financial Accounting and Reporting

Fragrance Oils has an obligation to the business, shareholders, and representatives of the Company to ensure that we report openly, honestly and accurately on our business performance. Accurate record-keeping protects our reputation. These include not only financial accounts, but other records such as quality reports, time records, expense reports and submissions such as benefit claim forms.

It is everyone's responsibility to ensure accurate and complete business and financial records, not just a role for accounting and finance personnel. Accurate recordkeeping and reporting reflects on the Company's reputation and credibility, and ensures that the Company meets its legal and regulatory obligations.

We will always:

- accurately and fairly report all business transactions;
- complete all expense claims accurately and in line with the employee business expense procedure;
- maintain records in accordance with legal requirements;
- never falsify any document;
- never enable another person to evade taxes or subvert local currency laws;

Policies and Procedures

Fragrance Oils recognises that there are risks associated with carrying out any business activity. Management is responsible for ensuring policies and procedures are put in place to manage risks and for complying with those policies and procedures.

Political Contributions

Fragrance Oils does not make contributions to political parties, political candidates or organisations which are politically active.

Employees should ensure that they are aware of the risks associated with their activities and that they comply with the policies and procedures in place to manage those risks.



Business Code of Conduct and Ethics

OUR APPROACH TO BEING A GOOD CORPORATE CITIZEN

Fragrance Oils is committed to being a good corporate citizen, taking account of the economics, social and environmental impact of our business and aims to maximise the benefits and minimise any negative impact of our global operations.

Anti-Slavery

Fragrance Oils has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any forms of modern slavery taking place within the business or our supply chain.

The Company has a separate [Anti-Slavery Policy](#) and [*Modern Slavery Statement](#) in place.

The Environment

The Company respects the environment and the need to protect it and will conduct its business with respect and consideration to minimise the impact its operations have on it. We ensure that all hazardous materials, waste or pollutants are properly labelled, stored, handled, transported, used and disposed of correctly. Our environment impact is relatively small, but we all still have a responsibility to look after it. We believe that developing a sustainable business is not only the best way to help look after our environment but also contributes to delivering a successful and ethical Company.

The Company has a separate [Environment Policy](#) in place.

Equality & Diversity (Equality Act 2010)

We promote a diverse, inclusive and equal workplace both internally and externally. Every employee is expected to treat everyone with whom we have contact, with dignity, courtesy and respect.

At Fragrance Oils we treat our colleagues, job applicants, business partners, and suppliers fairly and on merit. We hire, promote and reward our employees based on their capabilities and skills. The Company is registered with the UK Living Wage Foundation and is an accredited UK Living Wage employer paying above the Real Living Wage hourly rates. We do not discriminate against gender, race, colour, ethnic or national origins, marital status, family circumstances, age, disability, sexual orientation, political or religious beliefs.

Our employees, job applicants, have the right to work in a safe environment free from discrimination, bullying or harassment.

The Company has a separate [Equality and Diversity Policy](#) in place.

Government Regulators and Legislators

Fragrance Oils will seek to comply with all international, national and local legislation affecting its operations. It will strive to follow the best practice in corporate governance. It will meet its tax obligations. It will not make any financial contributions or offer support to any political party.

* Policy on Company Website



Business Code of Conduct and Ethics

Human Rights

Fragrance Oils is committed to the highest standards of business and ethical behaviour including compliance with all applicable laws and regulations, as well as Company policies, practices and procedures.

The Company is committed to conducting business in a manner that respects the human rights and dignity of all people. We do not tolerate any conduct that contributes to, encourages, or facilitates human trafficking, child labour, forced or compulsory labour or any other human rights abuses. We operate in many countries recognising the differing laws, cultural and social differences, supporting and upholding human rights principles and international standards.

The Company has a separate *Human Rights Policy* in place.

Local Communities

Fragrance Oils is fully committed to supporting and assisting the communities in which it operates through a variety of means including charitable fund-raising, sponsorship and charitable donations. We conduct our business with respect and consideration for the good of local communities, taking steps to minimise any disturbance as a result of our operations. We will also serve local interests by providing good employment opportunities, effective services, products and paying above the UK Real Living Wage for all employees regardless of age, which supports a standard of living for our employees and families.



Business Code of Conduct and Ethics

INTEGRITY IN DEALING WITH OTHERS

Dealing with Customers, Suppliers and Representatives of the Company

We recognise that our ethical and social performance and reputation is a key part of our overall success. The Company values its partnerships with our customers, suppliers and representatives. We treat these partners in the same manner we expect to be treated. .

Customers

Fragrance Oils believes that mutual trust and confidence between the Company and our customers is essential and will seek to build long term partnerships with its customers by being honest and straightforward in our dealings at all times.

Our aim is to understand our customer's needs and if during our discussions we consider that a customer's interests are not well served in the long term by our proposals, we will make this clear, even if this impacts negatively on our business.

We will also raise concerns with them if we become aware of any business practices or processes in their business we believe will compromise our own values.

We will respect the confidentiality of any information we may obtain in relation to our customers.

Competitors

It is fundamental to the success of the Company that we compete for and win business. Fragrance Oils will build its reputation on the basis of its performance alone. It will compete vigorously and lawfully and will not compete unfairly with others. It will not seek to damage the reputation of its competitors.

Fragrance Oils expects all of its employees to compete in the marketplace in a lawful and ethical manner which allows and respects healthy market competition, abiding by the laws of each country where business is conducted. We are expected to be fair, to act with honesty and to maintain the highest standards of personal integrity with one another and in all business dealings.

Suppliers and Service Providers (Ethical Trading)

A reasonable supply chain is critical to the success of our business. Fragrance Oils seeks to develop long term relationship with suppliers who share our ethical standards. These relationships are based on the principle of fair, open and honest dealings at all times. Only suppliers that share our standards and can demonstrate compliance will be considered appropriate to trade with.

We will work with our suppliers to resolve ethical trading issues. If suppliers are unable or unwilling to address critical issues associated with any breach of our Ethical Code, we reserve the right to terminate the relationship in accordance with our contractual rights.

The Company works hard to ensure our suppliers share our values and that we in turn treat them with trust and transparency. Suppliers will be chosen on the basis of factors such as price, quality, delivery, service and integrity. The Company's choice of suppliers will be made objectively. Honesty and openness will be paramount in the Company's dealings with its suppliers.

The Company has a separate **Ethical Trading Policy* and a separate *Procurement Policy* in place.

* Policy on Company Website



Business Code of Conduct and Ethics

EMPLOYEE COMMITMENTS TO FOIL

Employees have a duty to promote the interests of the Company. This policy cannot cover all eventualities where actions of employees may conflict with our ethical standards. Employees are therefore expected to exercise good ethical judgement, treat colleagues, customers and representatives of the Company with respect and dignity and not violate this code of conduct.

Absenteeism and Tardiness

Employees should follow their work schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. However, we expect employees to be punctual when coming to and leaving from work.

The Company has a separate [Time and Attendance Policy](#) in place to guide employees on the required standards.

Alcohol and Drugs

Fragrance Oils forbids the consumption of alcohol and use or storage of drugs on its premises. The Company will not permit any employee to work whilst under the influence of alcohol or drugs. Our policy applies equally to all staff regardless of grade, experience, or role within the Company. While at work and attending business related activities in any location you are strictly prohibited from using or being under the influence of alcohol or illegal drugs. From time to time the Company may organise events where alcohol is served. You are always expected to drink responsibly at these events.

The Company has a separate [Alcohol and Drugs Policy](#) in place.

Benefits

We expect employees to not abuse their employment benefits. This can refer to time off, facilities, subscriptions or other benefits that the Company offers.

Collaboration

Employees should work together in a friendly and collaborative manner in order to achieve the right results for the Company to achieve its goals. They should try not to disrupt the workplace or present obstacles to their colleagues' work. All employees are expected to be open for communication with their colleagues, supervisors or head of departments.

Communication

The Company encourages a free and open culture in its dealings between its management, employees and all people with whom it engages in business and legal relations. The Company recognises that effective and honest communication is essential if malpractice is to be effectively dealt with and the Company's success ensured.

Confidential Information

During the course of employment employees will have access to information of a confidential and sensitive nature. Employees must not disclose to a third party any Company confidential information either during their employment or after their employment has ended. Confidential information includes information on the Company's present or potential customers or suppliers and any information relating to the Company's business, including marketing, corporate or financial plans.

The Company has a separate [Confidentiality Policy](#) in place.



Business Code of Conduct and Ethics

Company Assets

Fragrance Oils has a wide variety of assets and you are responsible for protecting the Company's property entrusted to you.

We each have a duty to look after and respect all of Fragrance Oils assets – namely our place of work, computer and telephone, company vehicles, finances or supplies you may have access to and even our working time. We should protect our assets from misuse, theft and waste. We must also ensure other companies cannot gain an unfair advantage by accessing important information about our business.

You should:

- respect all kinds of corporate property; this includes **trademarks, intellectual copyright, computer programs, technical documentation, formulations and other property (information reports etc.)**. Employees should use them only to complete their job duties;
- protect Company facilities and other material property (e.g. company cars) from damage and vandalism, whenever possible;
- use Company resources responsibly and appropriately. Use common-sense, for example, the occasional personal phone call or email from your workplace is acceptable. Excessive personal calls or email is a misuse of assets;
- ensure hardware, such as laptops, phones and other handheld devices, are never left in public or insecure places;
- ensure that all sensitive, confidential and personal information you may handle stays secure;
- ensure business expenditure is accurately and honestly accounted for;
- the Company is committed to conserving the Earth's resources and to do what it can to reduce any negative effects it has on the environment. Employees are required to use the Company's equipment and materials wisely and reduce wastage where possible. Employees can play a positive role in helping the environment by recycling all non-confidential waste, using printers and photocopiers with care and switching off electrical equipment which is not in use.

Theft, misuse or damage of Company assets will be treated under the Company's disciplinary procedures which may result in termination of employment and criminal prosecution.

IT Equipment / Electronic Communication

Information is one of our most valuable assets and we must do all we can to protect it and handle information with care and integrity. You should remember that information has many forms from email, databases, voicemail, and websites through to paper-issued communication, photos and videos. Whatever its format, information and passwords must be appropriately protected.

The use of the email system, the Internet and the Company Intranet within Fragrance Oils is encouraged, as this use facilitates communication and improves efficiency. Inappropriate use, however, causes problems ranging from lack of productivity to legal claims against the Company. All employees must follow the Company's guidelines on the correct use of all IT equipment and electronic communication.

Please refer to the [Company's Electronic Communication and Email & Internet use Policies](#) for further information and guidance.



Business Code of Conduct and Ethics

Job Duties and Authority

All employees should fulfil their job duties with integrity and respect toward customers, suppliers, shareholders etc. Supervisors and managers must not abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise we expect team members to follow instructions and complete their duties with skill and in a timely manner.

Outside Employment

Employees may seek to take up separate employment with another employer or pursue outside business interests while still remaining employed by the Company. Although the Company has no desire to unreasonably restrict an employee's external activities, it must seek to protect its own interests and those of all its employees. It is the employee's responsibility to ensure that any non-Fragrance Oils employment or other activities do not violate existing Fragrance Oils commitments or relations with a competitor, customer, supplier or other third party.

Personal Appearance

Fragrance Oils considers the way employees dress and the image they project to be of significant importance in portraying a professional image of the Company.

As a result, it requires employees to dress in a manner that is suitable and appropriate to the Company's business. The Company recognises the diversity of cultures and religions of its employees and will take a sensitive approach when this affects dress and uniform requirements. However, priority will be given to health & safety, security and other similar considerations.

The Company has a separate *Dress and Appearance Policy and Uniform and Appearance Policy* in place that is designed to guide employees on the required standards of dress and appearance. All employees must follow this code.

Professionalism

All employees must show integrity and professionalism in the workplace and whilst carrying out their duties. All interaction with employees, customers and representatives of the Company must be professional, clear, honest and truthful.

Respect in the Workplace

All employees should respect their colleagues. Fragrance Oils does not allow any kind of discriminatory behaviour, harassment or victimisation. Employees should conform to the Company's policies in all aspects of their work, from recruitment and performance to interpersonal relations.

Social Networking

Employees must not access social media for personal reasons during working hours.

We expect all Employees who engage in social networking on websites or in groups which show any association with, or make reference to, Fragrance Oils, to behave consistent with Fragrance Oils values and policies. Employees must therefore ensure that the Company is not exposed to legal or reputational risks and the safety and security of employees and customers are not undermined. Failure to comply with this policy is a disciplinary offence which may amount to gross misconduct and could result in summary dismissal.

The Company has a separate *Social Media Policy* in place.



Business Code of Conduct and Ethics

CONFLICT OF INTEREST

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties. Employees must not allow any conflicts to arise between their interests and those of Fragrance Oils. A conflict of interest exists when a colleague's own interests or external relationships interfere or compete with the interests of the business, or influence their ability to make the right decisions.

Employees are required to follow the Company's policy on this subject and are expected to fully disclose and discuss any conflicts of interests with their Managers.

Family and Friends

We take special care to ensure that our personal interests do not conflict with our responsibilities. Employees should not directly or indirectly supervise, or use influence to favour anyone with whom you have a family or close personal relationship, including family members.

In certain circumstances, and at Fragrance Oils' discretion, it may be necessary to reassign someone to avoid a conflict of interest, or to take steps to maintain a harmonious and productive work environment. Interviewing, hiring or engaging a family member or close personal friend as an employee, consultant or business partner creates a conflict of interest. You must disclose any such relationship and remove yourself from the decision-making process.

Giving and Receiving Gifts, Hospitality and Entertainment

Maintaining high quality professional relationships with our customers and representatives is essential to the success of our business. Sometimes we provide or receive business courtesies, such as reasonable entertainment and modest gifts. However we never allow these courtesies to affect our ability to make objective, professional decisions or give the perception that our objectivity has been compromised.

Employees will neither seek nor accept for themselves or others any gifts, favours or entertainment without a legitimate purpose from any person or business organisation that does or seeks to do business with, or is a competitor of Fragrance Oils. Gifts and entertainment may be given to others at the expense of the Company as long as these are consistent with customary business practice and are not excessive in value.

All such activities must be carried out in accordance with the [Company's Hospitality and Gifts Policy](#) and [Business Expenses Policy](#)

Political Relationships

In your professional role as a Fragrance Oils employee, you should not get involved in any political activity or make a donation to a political party. We encourage you to remain politically neutral at all times.

We do, however, understand that you may wish to involve yourself in your own time and respect your right to do so. When this happens you must make it clear that the views you express are your own and not that of the Company.



Business Code of Conduct and Ethics

Romantic or Other Close Personal Relationships

Conflicts of interest also include romantic or other close personal relationships between managers and members of their teams which may result in the manager being personally biased, or appearing to be biased, when making employment decisions about the employee. Special care must be taken to ensure that our personal interests do not conflict with our responsibilities.



Business Code of Conduct and Ethics

OUR COMMITMENTS TO OUR EMPLOYEES

EMPLOYEES

*Fragrance Oils is committed to ensuring that our employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for us. We will work towards creating long-term relationships with all employees ensuring they are treated with dignity and respect with equal employment opportunities given to all irrespective of their race, religion, gender, sexual orientation. **The Company is registered with the UK Living Wage Foundation and is an accredited UK Living Wage employer paying above the living wage hourly rates.***

Fragrance Oils confirms that;

- no forced, bonded or involuntary labour shall be used;
- all employment with Fragrance Oils is freely chosen;
- staff are free to leave Fragrance Oils after reasonable notice;
- working hours are in accordance with the EU/UK Working Time Directive;
- remuneration is based on a recognised job evaluation system and staff are paid above the real living wage which is above the legal minimum wage;
- staff are not forced to work in excess of 48 hours per week, a voluntary opt out agreement is available for those wishing to work in excess of 48 hours per week;
- staff are provided with 2 days off per week;
- staff are given written terms and conditions of employment that detail the employment relationship between the respective employee and employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment;
- no deductions are made from wages as a disciplinary measure and pay-slips detailing lawful deductions are provided for each pay period;
- there shall be no recruitment or use of child labour;
- children or persons under 16 are not employed at any time, day or night;
- children or persons aged 17-18 may be employed full-time in accordance with the EU/UK working time directive;
- labour only contracting, sub-contracting and fixed term contracts are not used as a means to avoid obligations under labour or social security laws;
- Fragrance Oils takes adequate measures to prevent accidents and minimise potential hazards;
- Fragrance Oils has a published Health and Safety Policy and staff receive regular training;
- working conditions are safe and hygienic;
- employees have unrestricted access to washroom facilities and drinking water.

Bullying or Harassment

Fragrance Oils Limited Group of Companies ("Fragrance Oils") aim is to provide a working environment that respects the rights of each individual employee and where colleagues treat each other with the utmost respect. Any behaviour that undermines this aim is totally unacceptable. The Company will not tolerate any forms of bullying and harassment, under any circumstances.

Should any employee believe that he or she has been bullied or harassed; the matter must be raised with the Personnel Department who will arrange for it to be investigated impartially and without delay through the Company's disciplinary investigation procedure. Everyone has a responsibility to ensure that bullying and harassment have no place in the workplace and to uphold the principles of this policy.

The Company has a separate [Bullying and Harassment Policy](#) in place.



Business Code of Conduct and Ethics

Company Security / CCTV

The Company seeks to ensure as far as is reasonably practicable, the security of all its employees, visitors and contractors, property and buildings, whilst within or situated on Fragrance Oils premises.

The Company employs external Security Guards to patrol the site out of working hours and also uses closed circuit television (CCTV) images to protect the Company's property and to identify any breaches in security.

The Company has separate *Security and CCTV Policies* in place.

Data Protection and Privacy

The General Data Protection Regulations 2018 (GDPR) and the Data Protection Act 2018 comprise the data protection regime that applied in the UK from 25th May 2018. This regime supersedes any previous legislation.

Fragrance Oils holds and processes information on its employees for administration purposes. Our Policies set out the basis by which we collect, use and disclose the personal data of our employees, as well as their rights in respect of such Personal Data. We will only collect and handle data for "legitimate purposes" and in compliance with the data protection regime above.

The Company has a separate *General Data Protection Policy and *Company Privacy and Employee Privacy Policies* in place.

Equal Opportunity / Equality and Diversity

Fragrance Oils values all its employees for their contribution to the business.

The Company provides equal opportunities to all employees and applicants. We make employment decisions without regard to race, colour, age, gender, religion, national origin, mental or physical disability, medical condition, marital status, sexual orientation, gender identity or any other characteristics protected by law. This includes decisions related to recruiting, employment, promotion, termination, discipline, leave of absence, benefits and training.

Opportunities for advancement will be equal and will not be influenced by considerations other than their performance, ability and aptitude. Employees will also be provided with the opportunity to develop their potential and, if appropriate, to develop their careers further with the Company.

The Company has a separate *Equality and Diversity Policy* in place.

Health & Safety

The Company is committed to providing a safe and healthy working environment for all of its employees both on and off its sites. The Company applies its standards to all visitors to its sites.

Health and Safety is everyone's responsibility. We expect all our employees to play a part in making Fragrance Oils safer and ensuring their team has the right equipment, training and knowledge to guarantee a safe working environment.

The Company has a separate *Health and Safety Policy* in place.

* Policy on Company Website



Business Code of Conduct and Ethics

Recruitment

The Company is committed to equality of opportunity and diversity in the workplace. It is the Company's policy to treat all job applicants and employees fairly and equally, regardless of their sex, trans-gender status, age, sexual orientation, religion or belief, marital status, civil partnership status, race, colour, nationality, national origins, ethnic origin or disability. Furthermore, the Company will monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective. Our recruitment and people development decisions will be fair and objective. Appointments are based on qualifications, performance, skills and experience.

The Company has a separate *Recruitment & Employment Policy* in place.



Business Code of Conduct and Ethics

FAILURE TO ADHERE TO THE CODE

DISCIPLINARY ACTIONS

Disciplinary action will be taken where any employee fails to follow the Code, intentionally or repeatedly. Disciplinary action will vary depending on the violation.

Possible consequences include:

- demotion;
- reprimand;
- suspension or termination of contract for more serious offences.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behaviour.

Additional Policies and Guidelines

The Business Code of Conduct and Ethics does not address all workplace conduct. The Company maintains additional policies and guidelines that may provide further information on matters in the Code or address conduct not covered by the Code. These Policies are available on our Company Intranet/Website.