



Ramsden & Whale Limited
Ramsden Steel Drums Limited
Ramsden Pallets Limited

Supplier Code of Conduct

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Version 1

Dear Supplier,

At Ramsden Drums, we are dedicated to fostering a corporate approach that balances economic, social, and environmental objectives to achieve sustainability and create shared value. This commitment extends to our employees, shareholders, suppliers, communities, and all stakeholders with whom we engage.

We value strong partnerships with our Suppliers, built on shared principles of ethics and sustainability as outlined in this Supplier Code of Conduct. Through this Code, we aim to establish a fair, transparent, and sustainable supply chain, recognizing that collaboration is key to embedding responsible procurement practices across all levels of business.

All Suppliers providing goods, services, or works to Ramsden Drums are required to operate in full compliance with the principles set forth in this Code of Conduct. This document is publicly available on our website, forms an integral part of our contracts, and influences Supplier evaluations. Compliance with this Code is a fundamental prerequisite for collaboration, in addition to meeting legal and contractual obligations.

In cases of serious or repeated violations of this Code, Ramsden Drums reserves the right to suspend or terminate contractual relationships with the Supplier unless corrective measures are promptly implemented.

Mrs. Dawn Richardson
Director, Ramsden Drums



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Foreword

Ramsden Steel Drums Limited, Ramsden & Whale Limited, Ramsden Pallets Limited, and their subsidiaries¹ (collectively referred to as "Ramsden Drums," "Ramsdens," or the "Company") are dedicated to integrating economic, social, and environmental goals into a framework of sustainability. This commitment aims to create shared value for employees, shareholders, suppliers, the community, and other stakeholders engaged with Ramsden Drums' operations.

Ramsden Drums strives to build long-term partnerships within its supply chains by fostering fairness, transparency, and sustainability. To collaborate with Ramsden Drums, suppliers must not only satisfy quality, cost, and reliability standards but also align with the ethical and sustainable principles outlined in this document.

This Supplier Code of Conduct (referred to as the "Code") is published on the Ramsden Drums website and forms an integral part of all Ramsden Drums contracts. Compliance with this Code, along with meeting applicable legal and contractual obligations, is a fundamental requirement for all suppliers and business partners.

¹"Subsidiaries" refer to all companies and entities that are directly or indirectly controlled by Ramsden Drums. For the purposes of this definition, "control" is established through the direct or indirect ownership of at least 50% of the share capital or voting rights of such companies or entities. This includes any organization where Ramsden Drums has the ability to influence or direct management and operational policies, whether through ownership, contractual arrangements, or other means.



1) Recipients and Scope of Code

This Code applies to Ramsden Drums' business partners, including suppliers of goods and services, contractors, subcontractors, and their parent companies or subsidiaries (hereinafter collectively referred to as "Suppliers" or "Recipients").

Adherence to the principles outlined in this Code, as periodically updated or revised, is a fundamental requirement of all contractual agreements with Ramsden Drums for the duration of the business relationship. Suppliers are responsible for ensuring that their employees, collaborators, and downstream suppliers are informed about the principles of this Code. They must also promote, implement, and verify compliance with these principles throughout their respective supply chains.

Suppliers are expected to establish and maintain an effective management system that aligns with the values set forth in this Code, fostering ethical and responsible conduct within their operations and supply chains. Ramsden Drums also requires Suppliers to implement internal procedures to facilitate the reporting of any conduct that violates the principles of this Code or applicable laws and regulations in the countries where they operate.

In the event of any breaches of this Code, Suppliers are obligated to promptly notify Ramsden Drums and cooperate to address and resolve the issue. Suppliers must also work to ensure that their internal policies and procedures remain consistent with the principles outlined in this document.



2) Human Rights and Labour

Ramsden Drums upholds respect for human rights as a fundamental requirement in all its workplaces and business relationships. This commitment aligns with international principles and standards and ensures compliance with applicable national regulations concerning health and safety, working conditions, fair remuneration, non-discrimination, and inclusivity. Ramsden Drums firmly believes that respecting human rights is a non-negotiable prerequisite for engaging in any business partnership.

a) Diversity and Inclusion

Ramsden Drums expects its Recipients to promote a workplace free from discrimination in recruitment and employment practices. Discrimination based on gender, age, ethnicity, nationality, religion, disability, trade union membership, political affiliation, or sexual orientation is strictly prohibited. All workers must be treated with fairness, respect, and dignity. Equal access to training, career development, and advancement opportunities must be ensured for everyone. Recipients are also required to foster diversity and inclusion while actively opposing all forms of harassment, abuse, threats, or inappropriate behaviour in the workplace.

b) Forced Labour and Child Labour

Recipients must guarantee that employment is voluntary and free from coercion. Any use of forced, bonded, or involuntary prison labour is strictly forbidden. Recipients must also prevent any form of cruel, degrading, or inhuman treatment. Ramsden Drums has zero tolerance for child labour and requires Recipients to comply fully with local and international laws concerning the protection of children.

c) Salaries, Benefits and Working Hours

Recipients are required to adhere to applicable laws regarding salaries, benefits, working hours, and rest periods. Wages and benefits must be sufficient to ensure an adequate standard of living for employees and their families. Employment practices must provide fair working conditions and respect legal limits on working hours and rest periods.

d) Freedom of Association

Ramsden Drums supports open and constructive dialogue between employees, trade union representatives, and management. Recipients must respect workers' rights to freely associate, join trade unions, have representation, participate in company works councils, and engage in collective bargaining, in accordance with local laws and regulations.

e) Health and Safety of Workers

Recipients must comply with all applicable health and safety laws and regulations, ensuring hygiene, accident prevention, and safe working conditions. Recipients are required to establish and maintain a workplace that prioritises worker health and safety, proactively identifying and mitigating risks. To this end, the adoption of recognised and certified health and safety policies and/or management systems is encouraged to minimize hazards and eliminate causes that could compromise the well-being of personnel and third parties.



3) Respect and Environmental Protection

Ramsden Drums recognises the critical importance of protecting the environment to ensure that future generations can meet their needs. As part of its strategic decisions and business practices, the company embraces the principles of environmental sustainability. Ramsden Drums expects all Recipients to adopt this approach by aligning with and committing to shared principles for environmental protection.

a) Environmental Compliance: Adhering to Laws and Regulations

Compliance with environmental laws and regulations in the regions where Recipients operate is a fundamental requirement for any business relationship with Ramsden Drums. Recipients must obtain and maintain all required environmental permits and authorisations necessary to conduct their activities in compliance with current laws. It is also their responsibility to keep regulatory compliance updated over time.

b) Risk Prevention, Resource Management, and Innovation

Recipients are expected to adopt a preventive approach to environmental challenges, prioritising resource conservation, climate protection, and the integration of innovative technologies to enhance sustainability. Ramsden Drums encourages Recipients to:

1. Assess and minimise the environmental impact of their operations and supply chain.
2. Implement measures to reduce emissions (carbon footprint) and improve energy efficiency.
3. Engage in practices that reduce resource consumption and promote the reuse and recycling of materials.

Within their operations, Recipients must eliminate the use of substances prohibited by national or international regulations due to their harmful effects on health or the environment. They are required to establish safe and legally compliant processes for the handling, storage, and transport of hazardous materials. Waste, processing residues, and other materials must be managed, stored, and disposed of in accordance with legal requirements, ensuring safety at every stage. Additionally, Recipients must provide up-to-date safety information, such as material safety data sheets, for all supplied materials.

c) Environmental Responsibility: Fostering Awareness

Ramsden Drums is committed to raising environmental awareness among its employees through training initiatives and campaigns. Similarly, Recipients are expected to educate their staff on environmental responsibility, sustainable practices, and the principles of a circular economy to promote long-term environmental stewardship.



4) Ethical Business Practices and Corporate Integrity

Ramsden Drums operates with a steadfast commitment to integrity, loyalty, and professionalism in all aspects of its business activities. The company is dedicated to delivering high-quality products and services while adhering to principles of fair competition and respecting the legitimate interests of its shareholders, employees, customers, business partners, and the communities in which it operates. Ramsden Drums promotes a robust corporate governance and risk management framework, aligned with legal requirements and best practices.

a) Anti-corruption and Anti-money Laundering

Ramsden Drums has established and actively promotes a clear anti-corruption and anti-money laundering policy directed at its employees and business partners. This policy strictly prohibits all forms of corruption, unlawful favours, collusive practices, and inappropriate gifts or hospitality that deviate from corporate guidelines.

Recipients are strictly prohibited from engaging in or tolerating any corrupt practices. They must not offer, promise, accept, or authorize money, gifts, or other benefits with the intent, whether explicit or implied, of:

1. Inducing a public or private party to improperly perform duties or activities related to a business function.
2. Securing an undue advantage.
3. Violating any applicable laws.

Any requests or solicitations of this nature must be reported to Ramsden Drums immediately.

Recipients are also encouraged to implement compliance programs that align with Ramsden Drums' anti-corruption policy, fostering a culture of integrity and accountability. Additionally, Recipients must refrain from any activities linked to money laundering, financing of terrorism, or exploitative organisations. They are required to fully comply with all relevant anti-money laundering laws and regulations.

b) Antitrust, Compliance with Competition and Market Rules

Recipients are required to conduct their business activities in alignment with the principles of fair competition and relevant antitrust laws. This includes refraining from any agreements, arrangements, price-fixing, or other unethical practices that could unlawfully restrict market trade or hinder free competition. The Recipients must take all necessary measures to carry out business activities in alignment with applicable regulations relevant to Economic Sanctions.

c) Conflicts of Interest

Ramsden Drums places a high value on trust and transparency as the cornerstones of strong and lasting business relationships. To uphold these principles, any circumstances that could create or result in a conflict of interest - potentially compromising the ability of Ramsden Drums personnel to make fair, unbiased, and objective decisions - must be promptly disclosed to the Company. This enables an assessment of the situation and the implementation of appropriate actions to address it.



d) Data Confidentiality, Protection, and Privacy

Ramsden Drums prioritises the responsible management of information as a vital corporate asset. Recipients are expected to uphold this commitment by safeguarding any confidential information belonging to the Company. Such information, including industrial and intellectual property, trade secrets, and know-how, must not be disclosed or shared without explicit authorisation from Ramsden Drums. Recipients are obligated to use confidential information solely for authorised purposes and must take all necessary steps to protect it.

This obligation of confidentiality continues even after the business relationship with Ramsden Drums has ended, in accordance with applicable laws or as agreed upon by the parties. Furthermore, Recipients are required to handle personal data in strict compliance with relevant data protection regulations. They must implement robust procedures and security measures to ensure that personal data is processed lawfully, for legitimate and clearly defined purposes.

5) Compliance with the Code and Handling Non-Compliance

This Code is distributed directly to all suppliers, business partners, and stakeholders with whom Ramsden Drums engages, ensuring that they have the opportunity to review and sign it. By maintaining a business relationship with Ramsden Drums, Recipients acknowledge and accept the principles outlined in this Code.

Ramsden Drums reserves the right to request relevant documentation and to conduct independent audits, either directly or through authorised third parties, at the facilities, premises, and plants of Recipients to verify adherence to the Code's principles.

If the results of these audits reveal any deficiencies, Ramsden Drums is committed to collaborating with Recipients to identify and implement corrective actions. However, if these actions are not taken, or if there is significant or repeated non-compliance with the Code, Ramsden Drums reserves the right to suspend existing contractual relationships or, at its discretion, terminate the contract.

Recipients are responsible for ensuring compliance with this Code within their own operations and throughout their supply chain. They must promptly inform Ramsden Drums of any issues or breaches that conflict with the principles set forth in this Code.

6) Communication, Distribution and Updates

This Code has been formally approved by the management within Ramsden Drums. Any requests for clarification regarding its contents or interpretation should be directed to the following email address: enquiries@ramsdendrums.co.uk

Ramsden Drums retains the right to amend this Code at any time, for any reason, including but not limited to improvements in its practices, updates to the Company's compliance program, or changes in relevant regulations. This Supplier Code of Conduct will be distributed to suppliers via email, and any updates will be communicated accordingly.



7) Supplier Commitment and Declaration

By entering into a business relationship with Ramsden Drums, the Supplier:

- Acknowledges and agrees to adhere to the principles set forth in this Code, which are fundamental requirements for initiating and maintaining any business partnership with the Company;
- Agrees to participate in any due diligence processes, which may include completing questionnaires, providing self-certifications, undergoing online assessments, risk evaluations, and submitting relevant certifications or documents that demonstrate compliance with this Ramsden Drums Supplier Code of Conduct;
- Accepts that Ramsden Drums, or a third party appointed by the Company, may conduct announced audits or inspections, in line with the commitments, agreements, or contracts established;
- Commits to informing its employees, agents, subcontractors, suppliers, sub-suppliers, and collaborators of the principles outlined in this Code. These principles should be considered as minimum standards, and the Supplier will implement a due diligence process across their entire supply chain to ensure compliance.

As a supplier to Ramsden Drums, we can confirm that we have carefully read and understood the Code of Conduct and confirm that we will adhere to it.

Signee Full Name	
Company Name	
Position at Company	
Date	