

Reporting a concern

It is important that employees have the means to report any aspects of this Code that are not being followed.

Employees should not feel apprehensive about voicing concerns and should not believe that by doing so they are being disloyal or that they will experience recriminations. Reports made in good faith will be valued and individuals who make them will not be liable to disciplinary action.

The list below is not exhaustive, but we should report the following kind of incidents:

- criminal offences
- failure to comply with legal obligations
- miscarriages of justice
- false accounting or other false reporting
- misuse of Group assets
- improper relationships with suppliers, customers or competitors
- actions which endanger the health or safety of employees or the public
- actions which cause damage to the environment
- any other breaches of the NSG Code of Conduct

You can make a report to:

- (1) your line manager or his/her superior, or
- (2) if these are not appropriate:
Head of Group Legal
Head of Group Internal Audit
Head of Group Human Resources

Their contact numbers are published on the Group's intranet at:
<http://cmsdev.gb.glassnet/Intranet+/2/NSG+Group/Reporting+of+Concerns+Procedure.thm>

Your local Group Country Manager, in the countries where one is appointed, is also available as a contact.

The complete 'Reporting of Concerns' procedure explains in detail what you should do if you have concerns. You can find the full explanation in your own language by accessing the Group's intranet.

International human rights and employment standards

Internationally proclaimed human rights are acknowledged. We will apply employment standards within the Group that promote the application of human rights:

- abuse, harassment or intimidation will not be tolerated under any circumstances
- there will be no intentional discrimination in any employment-related activity on the basis of race, colour, creed, religion, age, gender, sexual orientation, national origin, disability, union membership or political affiliation. Local laws on age discrimination will be observed
- the Group will not engage in forced labour or employ young people under the age of 15, or older if defined by law
- there will be appropriate employee consultation and two-way communication on each site to meet the joint needs of the business and employees
- the right of employees to join or not join a trade union of their choice will be respected. In countries where specific legislation or legitimate collective agreements exist to regulate this matter, the legislation or collective agreements will be respected in full
- fair and just remuneration policies and practices will be followed
- employees will not be required to work excessive standard hours on a regular basis and overtime working will not be excessive
- training and relevant experience will be provided to enable individuals to perform their roles safely and competently and to develop their full potential

FURTHER ASSISTANCE

If you need further help in understanding this leaflet or the Code itself, please consult your line manager or Human Resources manager, or the relevant Group policies and procedures on the Intranet.

The full version is available in all languages on the Intranet under Central Functions/Human Resources. Printed copies can be obtained from local Human Resources departments.

ENG 2010

The Way we do Business



Code of Conduct Guidelines for NSG Group Employees

NSG
GROUP

What is the NSG Group Code of Conduct?

It is the NSG Group's mission to be the global leader in the manufacture and supply of glass products, through the best use of our people and technology and the pursuit of innovation; judged best in class by our customers, our people and our shareholders. The Code of Conduct sets out the principles by which the Group will strive to conduct its business activities in pursuit of its mission.

The Code defines the conduct expected from all of us across all areas of our business and applies to relationships among ourselves and with customers, suppliers, business partners, the community and all others with whom we have contact in daily business life.

The Code cannot anticipate every situation that may occur. However, the spirit and intention of the Code should be followed, whatever the circumstances.

The Code is underpinned by the Group's Values and Principles and should be the basis for any decisions we have to make, in order to ensure that outcomes are in the best interests of the NSG Group and its stakeholders.

Key Features of the Code

Working safely

Our health and safety, as well as that of contractors, neighbours, visitors and customers who use our products, is of paramount importance.

The Group aims to provide a clean, healthy and safe working environment, in accordance with best industrial practice.

We all have a duty to take every reasonable precaution to avoid injury to ourselves, our colleagues and members of the public.

Sustainability

We are committed to running our business in accordance with the principles of Sustainability. We will seek to protect and enhance the environment by; operating existing plant and equipment in ways which minimise our impact on the environment and cause no harm, developing new manufacturing processes that are more sustainable, and developing and promoting products that encourage more efficient use of natural resources throughout their lifecycle.

Law, culture and ethical behaviour

All national and international laws and regulations are observed and cultures of the countries in which the Group operates are respected. We must accept personal responsibility for behaving with integrity and fairness and in a professional and ethical manner.

Avoiding conflicts of interest and political activities

We must not engage in outside interests, activities or investments that conflict with the performance of our duties or affect our ability to apply independent judgement on behalf of the Group.

Personal political activities must be conducted separately and apart from the Group's business.

Gifts, favours and payments

The exercise of independent judgement on behalf of the Group must not be influenced by personal advantage.

No one may give or accept gifts, favours or entertainment that could be construed as a bribe, kickback or payoff. Modest gifts or entertainment may only be given or accepted under strict conditions set out in the Code.

Payments in any form made to a government body or officials for the purpose of obtaining business or other advantage are prohibited.

Relationships with customers, suppliers and competitors

The NSG Group aims to provide its customers with products that are well designed, of high quality, competitively priced, delivered to schedule and backed by excellent customer service.

The selection of suppliers will be on the basis of quality, price and performance of the products and services offered.

The Group believes in free and open competition and will compete vigorously, but with integrity and honesty. Everyone must comply with national and international laws and the regulations relating to competitive activity.

Relationships with the community

Long-standing relationships with local communities are encouraged and can be of mutual benefit to the community, the Group and its employees.

Integrity of Group records

The books and records of the Group must reflect all transactions accurately and completely. No employee may engage in conduct or make arrangements that result in false or artificial entries in any Group record, including expense statements.

Personal information

The Group and its employees must ensure that personal data is processed in a secure manner and is only used for the purpose intended. Information stored on computers will not be used by itself to make decisions affecting individuals. These decisions should be the result of consultation between the individual and their manager.

Protecting confidential Group information

Confidential information relating to the Group's financial and commercial activities, customers, suppliers, trade secrets and technical know-how is an important asset of the Group. It must not be revealed at any time to anyone outside the Group, unless the person receiving the information has signed an appropriate confidentiality agreement, approved by the Group's lawyers.

Responsibilities of individuals

Each and every one of us has the responsibility and is trusted to maintain the standards set out in the Code.