

European Sealing Association (ESA) General Code of Conduct

1. Purpose and Commitment

The European Sealing Association (ESA) is committed to the highest standards of ethical conduct, integrity, and compliance with all applicable laws and regulations. This Code of Conduct outlines the principles expected of all ESA Members, Member Companies, and participants in ESA activities.

We are dedicated to:

- Upholding human rights
- Promoting fair business practices
- Ensuring environmental responsibility
- Maintaining transparency and accountability
- Preventing anti-competitive or illegal practices

2. Business Ethics

2.1 Compliance with Law

Members must comply with all applicable laws, including:

- Anti-bribery and anti-corruption (e.g., UK Bribery Act 2010)
- Anti-trust and fair competition regulations (e.g., GWB, Articles 101/102 TFEU)

2.2 Anti-Trust & Competition

ESA does not tolerate any activities that may distort or restrain competition. In ESA meetings, the following are strictly prohibited:

- Discussions on pricing, costs, production plans, or business strategies
- Sharing of confidential or proprietary information
- Any illegal anti-competitive behaviour

2.3 Bribery, Gifts, and Corruption

Members must not offer, accept, or tolerate bribes or improper gifts to influence business decisions.

Prohibited inducements include commissions, gratuities, services, or other favours.

2.4 Conflict Minerals

Members must avoid sourcing materials that fund armed conflict or contribute to human rights abuses.

2.5 Intellectual Property

ESA and its Members respect trade secrets and proprietary information. Members must not use or disclose unlawfully obtained confidential data.

3. Standard Business Practices

3.1 Recordkeeping

Members must:

- Maintain accurate, lawful business records
- Comply with all financial and data retention regulations
- Store and manage personal and business data responsibly

3.2 Data Protection

Protect all personal and confidential data, especially when handling ESA-related information.

Implement appropriate cybersecurity measures to prevent unauthorized access.

4. Employment Practices

4.1 Equal Opportunity and Anti-Discrimination

Members must:

- Promote a workplace free from harassment or unlawful discrimination
- Respect diversity, regardless of age, race, gender, religion, sexual orientation, or political views

4.2 Human Rights and Labour Standards

- Prohibit slavery, forced labor, and human trafficking
- Reject child labour and uphold ILO and UN Global Compact standards
- Provide safe and healthy working environments

4.3 Employment Law

- Maintain proper employee documentation
- Provide clear contracts detailing remuneration, duties, and rights
- Respect the rights of employees to organize and bargain collectively

5. Environmental Responsibility

Members must:

- Comply with all applicable environmental regulations
- Implement practices that minimize environmental impact
- Develop sustainable products and operations
- Promote environmental awareness among staff

6. Compliance and Enforcement

6.1 Reporting Non-Compliance

If a Member witnesses potential misconduct:

They must report the concern to a member of the ESA Executive Committee.

Alternatively, reports can be submitted anonymously to ESA Compliance Lawyer:

Brödermann & Jahn, Neuer Wall 71, D-20354 Hamburg, Germany

Tel: +49 (0) 40 - 370 90 5 – 0

Email: esa-compliance@broedermann.de

Subject: “ESA-Compliance-Program”

6.2 Investigations and Sanctions

- Reports will be investigated promptly.
- If sufficient evidence of misconduct exists and is not rebutted, the Member may be suspended.
- Violations of competition laws may result in termination of membership.
- If no wrongdoing is found, Members will be reinstated.

6.3 Annual Review

At the final Executive Committee meeting each year:

- Members must confirm whether any non-compliant behaviour was reported
- These findings and related actions will be documented

7. Auditing and Documentation

ESA reserves the right to:

- Audit Members' compliance with this Code with reasonable notice
- Request documentation as proof of adherence

By participating in ESA activities or being a Member Company, you agree to comply with this Code of Conduct and uphold the values and obligations it represents.