Lightning Packaging’s aim is to improve the standard of living of its employees and contribute to the economic, environmental and social well-being of its customers and suppliers and the communities in which we operate.

We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards. Adherence to applicable local laws and regulations, and the application of common sense, logic and the basic standards of behaviour expected in the society in which we participate, should guide each employee in determining the correct course of action that supports these standards in their daily working lives:

**Conflicts of Interest**

All employees should avoid situations where personal interests could conflict, or appear to conflict, with the interests of Lightning Packaging and its Parent Company, Bunzl Plc. Our reputation depends not only on our high-quality services and products but also on the manner in which we conduct our relationships with customers, suppliers, government officials, organisations and others outside of Lightning Packaging. Each employee must ensure that his/her conduct does not provide, or give the appearance of providing, him/her with personal gain at the expense of Lightning Packaging or third parties with which Lightning Packaging deals.

**Gifts and Entertainment**

The giving and receiving of gifts, entertainment and gratuities between employees, customers and suppliers or other outside business acquaintances represents a source of potential conflict of interest. Any significant gift or entertainment likely to be deemed as influential upon decision making is unacceptable.

**Illegal Payments and Political Donations**

The making or receiving of illegal payments or inducements, such as bribes or facilitation payments or other corrupt practice, is contrary to the policy of Lightning Packaging and the funds and resources of Lightning Packaging shall not be used directly or indirectly for any such purpose. It is Lightning Packaging’s policy not to make any donations to political parties.

**Relationships with Customers and Suppliers**

Each employee has the responsibility to ensure there are no compromises in delivering the highest standard of services and products and that every aspect of our operations which impacts upon quality promotes and reflects these standards. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation of material facts.

**Compliance with Laws, Rules and Regulations**

Lightning Packaging and our employees must observe all laws, and regulations. Employees who are involved in the preparation of any information that will be included in any public communication to investors or in any document or report that will be filed with the London Stock Exchange or the UK Listing Authority must ensure that such information is full, fair, timely and understandable. All such public communications may only be made through Bunzl plc.

**Dealing in Bunzl Shares**

Employees must not disclose unpublished “price sensitive” information to any person, whether or not an employee. All non-public information should be considered inside information and should never be used for personal gain and may be unlawful. The Bunzl Code for Dealing in Securities in relation to the purchase, sale or other dealing in the shares of Bunzl plc should be observed at all times. Most notably, affected employees and associated persons should always obtain prior consent from the Company Secretary before dealing in the Company’s securities.

**Protection of Confidential Information**

No employee shall without proper authority access, modify, disclose or make use of any trade secrets, confidential commercial or personal information for any purpose other than as properly required for legitimately carrying out his or her duties. The obligation of confidentiality continues after employees cease working for Woodway and covers disclosure to others.

**Protection and Proper Use of the Group’s Assets**

Each employee is responsible for the protection and wise stewardship of our assets. This includes being responsible for the establishment of, and adherence to, procedures that ensure our assets are not put in jeopardy or used wastefully. Whether it is responsibility for, for example management of equipment and premises, energy conservation, security, protection of information or effective control procedures, every employee must seek to use all our resources with efficiency, honesty and the highest standards of care. All employees are prohibited from taking for themselves business opportunities that arise through the use of Lightning Packaging’s property, information or position. This includes obtaining personal gain or competing with Lightning Packaging.

Signed: Cara Jeffrey Date: 22nd January 2024

Printed: Cara Jeffrey Position: Managing Director