

De La Rue's ethical framework

Code of Business Principles – nine topics

Bribery & corruption	Conflicts of interest	Gifts & hospitality	Health, safety & environment	Employment principles	Records & reports	Personal information	Insider trading	Competition & anti trust
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Backed up by policies

Anti bribery & corruption Gifts & entertainment Charitable giving	Conflicts of interest Gifts & entertainment	Gifts & entertainment Expenses Anti bribery & corruption Conflicts of interest	Health & safety Environmental Fire safety	Equal opportunities Anti harassment	Group finance manual	Data protection	Share dealing, market abuse & insider trading	Competition & anti trust
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Supported by processes

Third party partners Gifts register Expenses vetting	Gifts register	Gifts register Expenses vetting	Monthly reporting Global HSE standards ISO management systems	Grievance procedure Disciplinary process	Compliance declarations External monitoring Separation of duties	Data protection officer Annual data protection returns	Procedure for controlling inside information Dealing approvals	Legal department guidelines
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Underpinned by oversight, controls and communication

CodeLine	Employee survey	External audit	Ethics Committee	Internal audits	Specialist audits	Benchmarking	Training/ induction	Intranet	Risk reviews
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