



POLICY ON SOCIAL RESPONSIBILITY & BUSINESS ETHICS

McBride plc is committed to achieving a long-term successful and sustainable business as Europe's leading provider of private label household and personal care products. Our success and sustainability are founded on the following principles which outline our approach to business:

Sustainability and The Environment – we aim to continuously reduce the environmental impact of our operations and products

Health & Safety – we aim to provide safe working environments underpinned by comprehensive internal safety management procedures and external accreditation.

Employment Practices – we strive to retain and develop our employees and to help them to fulfil their potential. We respect human rights and we provide equal opportunity for all. Unacceptable behaviours are not tolerated.

The Community – We work closely with the communities within which we operate to reduce any adverse impact and make a positive contribution where possible.

Business Ethics – we have a strong code of ethics and expect all employees to behave with honesty, discretion, integrity and respect for all parties with whom business is transacted, including customers, suppliers, contractors, agents, etc.

We recognise the importance of social responsibility in our business and the contribution it makes to our success. The company recognises its obligations to all those with whom it has dealings; our approach to the environment, product safety and how we treat our people, our customers, our suppliers, our local communities and other key stakeholders is embedded in our company culture and values. We demand and expect high ethical standards in carrying out our business activities.

The policy is supported by more detailed policies and guidelines to help management and all employees to behave appropriately in all their business dealings. This policy adopts the principles of international standard SA8000.

1. SUSTAINABILITY AND THE ENVIRONMENT

McBride is committed to the concept of Sustainable Development as defined in 1987 by the Brundtland Commission;

“...development which meets the needs of today without compromising the ability of future generations to meet their own needs.”

We have published a Sustainability & Environmental Policy on the company web-site - www.mcbride.co.uk - and each year we publish an annual Sustainability Report. Our aim is to ensure that our manufacturing processes, facilities, distribution practices and our products have the least possible impact on the environment by having an effective Environmental Management System at every manufacturing site and by auditing activities using independent accredited organisations.

We monitor performance against relevant sustainability and environmental objectives. These results are published annually in our Sustainability Report.

2. HEALTH AND SAFETY

We have a separate health and safety policy which is published on the company web site – www.mcbride.co.uk - and management systems that provide safe working environments and ensure that human rights are respected and that local laws relating to health and safety in the workplace are met. We involve employees widely in health and safety issues and encourage actions to ensure the safety of staff and visitors to our sites.

McBride is committed to high standards of product safety; we take care to understand safety issues related to products and ensure they are suitable and safe for their intended use. Wherever possible this is achieved without testing on animals, in line with our separately published policy on Animal Testing – www.mcbride.co.uk .

3. EMPLOYMENT PRACTICES

The quality and effectiveness of the management of the Group's people is critical to the attainment of our business objectives. We therefore strive to ensure equal opportunity for all in recruitment, selection, promotion, employee development, training and reward policies and procedures. We do not tolerate discrimination and other unacceptable behaviours and do not condone the use of child labour.

We respect the rights of employees to form and join Trade Unions of their choice and to bargain collectively. We strive to retain and develop employees and to help them to fulfil their career potential.

We pay fair wages for a standard working week that will meet at least legal or industry minimum standards which will be sufficient to meet basic needs of personnel and provide some discretionary income.

4. THE COMMUNITY

We work closely with the communities in which we operate to reduce any adverse impact of our activities on the lives of local people and to make a positive contribution where possible. We work to forge positive relationships with local authorities and regulatory agencies.

5. BUSINESS ETHICS AND RELATIONSHIPS

We are committed to providing high quality products and services to our customers. Customer service is considered to be the primary operational goal across the Group. We employ purchasing procedures that select suppliers on the basis of specification, quality, service and economic factors and favour those who operate in an ethical and socially responsible manner and who are committed to minimising the impact of their operations on the environment.

Employees must at all times treat competitors with respect. Confidential information, including pricing, must not be discussed with competitors and no attempt must be made to improperly acquire trade secrets or any other confidential information from competitors.

Anti-competitive practices are not tolerated and compliance with company guidelines is expected at all times.

Employees must never agree or seek to agree retail prices or trade margins and never attend meetings with competitors at which pricing is discussed.

We hold regular meetings with analysts and institutional shareholders to ensure that they are regularly and consistently appraised of the performance of the Company and its prospects.



Whilst there may be some geographical variation due to local legislation and business practice, the following standards are common to all business activities:-

Compliance with Legislation

Under no circumstances will financial inducements or bribes be offered, made or accepted regardless of amount, whether direct or indirect, or to or from third parties, including government officials. Fraudulent acts of any kind are forbidden. All contracts will be based on fairness and equality of treatment for potential suppliers

All accounting transactions and business assets must be authorised and recorded in line with the Group's published policies

Contributions to political parties will not be made

Statements or reports provided to external parties will not be misleading. Sensitive company information must not be disclosed.

Contact with media must always follow procedure and be through authorised company officers only

Working closely with regulatory bodies and local authorities as necessary is actively encouraged

McBride employees are expected to conduct all business dealings with utmost discretion, integrity and respect for all parties.

Employees must not make use of confidential information obtained through their employment for personal gain, nor disclose such information to any third party during or after employment.

Where a potential conflict of interest may arise, employees are obliged to declare this and to seek advice from their line manager or the Company Secretary.

Insider dealing is illegal and not tolerated within the company; clearance to deal in the Group's shares must be sought by all senior management from the Chief Executive or the Group Finance Director prior to dealing. Detailed guidelines on Insider Dealings are available on the company web site – www.mcbride.co.uk .

Improper use or abuse of company computer systems is regarded as a disciplinary matter. McBride prohibits breach of copyright, contracts or licence agreements and viewing or distribution of offensive material

While respecting the privacy of its employees, McBride expects them to be law abiding and not to demonstrate anti-social behaviour which could adversely affect the reputation of the Group.

6. COMPLIANCE

It is a responsibility of all managers to ensure that McBride policies are properly communicated, understood and applied. Managers are also responsible for undertaking full investigations into suspected breaches of McBride policies, rules and guidelines. This may involve disciplinary action where necessary and appropriate.

Employees are encouraged to advise their managers as soon as possible where they either suspect or believe there has been a breach of the Group's Social & Ethical Policy. Any such communication will be handled confidentially and may be registered anonymously if the employee so desires.

Employees are encouraged to report serious malpractices such as fraud, corruption, bribery and criminal activities to either their line manager or independently to the Company Secretary. There is a specific policy statement and guidance related to Whistleblowing.

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REVIEW

This policy is approved by the Board and reviewed annually. The group Chief Executive is accountable for ensuring that the Group operates in accordance with the policy. The policy is published on the Company web site (www.mcbride.co.uk) to communicate widely the behaviours and practices we expect in all business dealings transacted by McBride.

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Miles Roberts
Chief Executive
McBride plc