

CODE OF ETHICS



1. Employment is freely chosen

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.3 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

- 6.1 Working hours must comply with national laws and collective agreements, whichever affords the greater protection for workers and these are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. Workers shall be provided with at least one day off in every 7 day period. Working overtime must be voluntary and shall not exceed 12 hours per week. Overtime shall always be compensated at a premium rate.

7. No discrimination is practiced

- 7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

- 8.1 To every extent possible work performed must be on the basis of recognized employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

10. Accurate and open business cooperation

10.1 Within our business activities we always comply with all applicable laws and regulations.

10.2 The associates always provide complete, true and accurate information and never knowingly state untrue or distorted information.

10.3 Any business partner we work with must comply with this code of ethics.

10.4 Receiving or providing of bribe is absolutely unacceptable. Bribe is defined as an improper advantage provided by any cash or non-cash performance with the purpose of generating a profit or maintain business. We absolutely reject any influence of business and other decision and arrangement of an unfair benefit in other manner than through our own economic performance.

10.5 We strictly comply with all legal regulations related to anti-money laundering, financing any illegal activities, and combating terrorism and support of terrorism. We cooperate only with business partners whose business plans are to our knowledge financed only from legal sources.

11. Environmental responsibility

11.1 The company is aware of its environmental responsibility.

11.2 We comply with all applicable environmental laws and regulations.

11.3 We strive to minimize toxic and hazardous substances and materials within our business activities and ensure the relevant management of toxic and hazardous substances and materials. We use procedures and technologies that are environmentally-friendly. We strive to minimize environmental impacts by improving our energy efficiency and reducing our waste.

The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

