

The Company's Corporate Social Responsibility Policy is to act and conduct business in a socially and ethically responsible manner and to seek to purchase and provide goods and services which:

- a) are produced and delivered under conditions that do not involve the abuse or exploitation of any persons;
- b) have the least negative impact on the environment

Such considerations will form part of the evaluation and selection criteria for all goods and services purchased by the Company.

This Policy applies to the Company and to its suppliers and subcontractors.

PURPOSE

The purpose of the policy is to:

- a) promote good labour and environmental standards in the supply chains of the Company;
- b) encourage the conducting of business in a socially responsible and ethical manner;
- c) encourage engagement with, learning from, respecting of and supporting of, the communities and cultures with which we work; and
- d) to protect the Company's reputation

CONDUCT FOR SUPPLIERS AND OUR OWN COMPANY

Suppliers should be adopting a Code of Conduct that commits to continuous improvement, as we do, towards compliance with the labour and environmental standards specified, both in their own companies and those of their suppliers.

A. LABOUR STANDARDS

The labour standards in this code are based on the conventions of the International Labour Organisation (ILO) and the SA8000 standard for Social Accountability.

Employment is freely chosen:

- There is no forced, bonded or involuntary prison labour
- Workers are not required to lodge 'deposits or their identity papers with the employer and are free to leave their employer after reasonable notice. However, they have to provide a copy of their passport for right to work purposes.

Freedom of association and the right to collective bargaining are respected:

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the legitimate activities of trade unions. Worker's representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Working conditions are safe and healthy:

- A safe and healthy working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.

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- 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 minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- The Company shall establish systems to detect, avoid, or respond to potential threats to the health and safety of all personnel.
- The Company shall provide, for use by all personnel, access to clean toilet facilities and clean drinkable water, and, if appropriate, sanitary facilities for food storage.
- A senior management representative shall be appointed as responsible for the health and safety of all personnel.

Child Labour shall not be used:

- The Company shall not engage in or support the use of child labour (i.e., persons under 15 years of age, however, for work experience purposes 15-year-olds may be temporarily employed).
- Where child workers are employed, policies and risk assessments must be established for the remediation of children, with adequate support to attend and remain in school or education, until no longer a child as defined above. In these situations, children and young workers must not be employed during school hours and their combined hours of daily transportation (to and from work and school), school and work time must not exceed 10 hours a day.
- Children and young workers under 18 years of age shall not be exposed to situations in (or related to) the workplace that are hazardous, unsafe or unhealthy as defined in the appropriate young person's risk assessment.

Living wages are paid:

- The Company shall ensure that wages paid for a standard working week meet, as a minimum, legal or industry standards, whichever is higher.
- In any event, wages should always be sufficient to meet the basic needs of personnel and to provide some discretionary income.
- Wage and benefits composition must always be detailed clearly and regularly for workers, and all workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment. Remuneration must be in a manner convenient to workers, such as, BACS, or other form of bank transfer.
- 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 express and informed permission of the worker concerned. All disciplinary measures should be recorded.
- Labour-only contracting arrangements and false apprenticeship schemes shall not be undertaken by the Company in an effort to avoid fulfilling obligations to personnel under applicable laws pertaining to labour and social security legislation and regulations.

Working hours are not excessive:

- Working hours shall comply with applicable laws and industry standards, whichever affords greater protection.
- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7-day period on average.

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- Where working over 48 hours per week is required, workers may choose voluntarily to opt-out of the 48-hour working week agreement. This opt-out agreement must be re-signed annually and may be withdrawn by the employee in writing at any time, allowing for reasonable notice.
- Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

No discrimination is practised:

- There must be 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, with all such decisions made on the person's ability to carry out the work.
- The company will always strive to build trust, deliver mutual advantage and demonstrate respect for human dignity and rights in all relationships it enters into, including respect for cultures, customs and values of individuals and groups.

Regular employment is provided:

- To every extent possible work performed must be on the basis of a recognised employment relationship established through national law and practice.
- 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.

No harsh or inhumane treatment is allowed:

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- The abuse of human rights is not accepted or condoned, and the company will not engage or be complicit in any activity that solicits or encourages human rights abuse.

B. ENVIRONMENTAL STANDARDS

Suppliers should as a minimum comply with all statutory and other legal requirements relating to the environmental impacts of their business, as our own company does. The Company recognizes that pollution prevention, biodiversity and resource conservation are key to a sustainable environment, and will effectively integrate these concepts into our business decision-making.

Detailed performance standards are a matter for suppliers, but should address at least the following:

Waste Management:

- Waste is minimised and items recycled whenever this is practicable.
- Effective controls of waste in respect of ground, air, and water pollution are adopted. In the case of hazardous materials, emergency response plans are in place.

Packaging and Paper:

- Undue and unnecessary use of materials is avoided, and recycled materials used whenever appropriate.

Carbon Dioxide Production:

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- Processes and activities are monitored and modified as necessary to ensure the amount of Carbon Dioxide emitted from the processes and activities is kept to the minimum possible.

Conservation:

- Processes and activities are monitored and modified as necessary to ensure conservation of scarce resources, including water, flora and fauna and productive land in certain situations.

Energy Use:

- All production and delivery processes, including the use of heating, ventilation, lighting, IT systems and transportation, are based on the need to maximise efficient energy use and to minimise harmful emissions.

C. BUSINESS BEHAVIOUR

Sale of Arms:

The conduct of the supplier should not violate the basic rights of the Company's intended beneficiaries. The supplier should not be engaged:

- in the manufacture of arms;
- in the sale of arms to governments which systematically violate the human rights of their citizens; or where there is internal armed conflict or major tensions; or where the sale of arms may jeopardise regional peace and security.

Finances and Assets:

The Company is committed to maintaining the highest standards of integrity and management practices in order to maintain excellence in our daily operations, and to promote confidence in our management systems.

We will conduct business in an open, honest, and ethical manner.

We will advise our partners, contractors, and suppliers of our Corporate Social Responsibility Policy (this document) is available to view on our company website, and will work with them to enable them to achieve consistency with this policy. Under our current supplier approval system we require all our suppliers to demonstrate their compliance with Corporate Social Responsibilities

Corporate Social Responsibility:

The company will endeavour to maintain a wider commitment to helping to build a better society in general, beyond profit maximisation and the best insular interests of the company, its staff and its shareholders.

The company will consider the needs of communities and the environment, both through its day-to-day business activities and extra-curricular activities such as charitable donations, with particular commitment to those communities local to our business operations.

OPERATING PRINCIPLES FOR THE COMPANY AND SUPPLIERS

The undersigned is responsible for ensuring compliance with this Policy.

The Company will:

- Communicate its Corporate Social Responsibility Policy to employees, and to suppliers of goods and services, as well as to any other interested parties via our company induction program and via the company website

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CORPORATE SOCIAL RESPONSIBILITY POLICY

- Make appropriate human and financial resources available to meet its stated commitments, including training and guidelines for relevant personnel.
- Adopt appropriate methods and systems for monitoring and verifying the achievement of the standards.
- Seek to maximise the beneficial effect of the resources available, where required, and by prioritising the most likely locations of non-compliance.
- Report progress in implementing the Corporate Social Responsibility Policy periodically through the Company's Management Review Meetings.

The Company expects suppliers to:

- Meet their obligations under current legislative requirements for Corporate Social Responsibility and maintain and where required improve their systems for this compliance

QUALIFICATION TO THE POLICY STATEMENT

The Company can accept neither uncontrolled cost increases nor drops in quality. It accepts appropriate internal costs but will work with suppliers to achieve required ethical standards as far as possible at no increase in cost or decrease in quality.

This Policy will be reviewed following any changes to working practices or applicable legislation, or at least annually.

COMPLIANCE

In establishing whether or not any conduct or activity may be in contravention of this policy, ask yourself whether:

- It is legal?
- It is in breach of this or any other policies?
- It could be perceived as bringing you, your colleagues or the Company into disrepute?
- It could be perceived as compromising you, your colleagues or the Company?
- It could be considered by the public as ethical, appropriate and acceptable?

If you are in any doubt, stop and contact either your line manager or any member of senior management. Contravention of this Policy could lead to disciplinary action.



Signed: _____
Mark Mack
Joint Managing Director



Signed: _____
Kevin Newton
Joint Managing Director

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