



ETHICAL POLICY

Amended June 2016

Our purpose for this ethics policy is to establish a culture of openness, trust and integrity in the business practices we use. We are committed to being a socially responsible organisation, taking into consideration the environmental, social and economic footprint of our business on the local communities where we operate and aim to maximise the benefits and minimise any negative impact of our operations where possible. This includes abiding by written laws and legislation for the relevant counties we are working within.

Scope

This policy applies to employees, contractors, consultants, temporaries, and other workers at our company, including all personnel affiliated with third parties and contractors. Such individuals or parties will be expected to familiarise themselves with the principles of this policy. It will remain the responsibility of our suppliers to ensure that their employees and subcontractors are informed about and comply with this policy and it will be clearly recognised when setting up new contracts, that a company will be abiding by this statement.

Legal Responsibility

We expect all of our operations, suppliers and our subcontractors to obey national as well as regional statutory requirements of the counties in which they are operating for all their activities. We recognise that different countries have different legislation that must be adhered to and we will ensure that our contractors, where possible are committed to these laws. However, we understand these laws as a minimum standard and expects our suppliers and employees to operate with the highest moral standards.

Local Communities & The Environment

We are fully committed to supporting and assisting the communities in which we operate by conducting our business with respect and consideration for the wellbeing of local communities. All operating facilities will be discreet within the local neighbourhood and will work to give back to the community where possible.

We are further committed to the preservation and improvement of the environment we operate in. We expect all companies to comply with environmental, safety and health laws and regulations, and to the extent practical, put into action programmes that exceed national governmental requirements. All companies must do whatever they can to minimise their operations' impact on the environment. We will recycle where possible any materials we can during our supply chain process. Recycling facilities are in place and employees are encouraged to use them and reducing the impact of the business on the environment is a high priority.

Human Rights

We believe in the philosophy of the United Nations Universal Declaration of Human Rights and we are committed to maintaining this in our working practices. Respect for human rights continues to remain the cornerstone of our decision making.

We will endeavour to co-operate with business partners to ensure they conduct their operations in a manner that meets these standards and our own.

We will continuously take steps to ensure that the operations of our employees and suppliers do not counter internationally accepted human rights conventions and where possible will only source products from countries that have legislation that meets the standard of the United Nations Universal Declaration of Human Rights.

Child Labour

A child in this context is a person younger than 15 years of age, or 14 years of age in accordance with the exceptions for developing countries as set out in Article 2.4 in the ILO Convention No. 138 Minimum Age.

We base our child labour code on the UN Convention on the Rights of the Child, article 32.1. We recognise that children have the right to be protected from exploitation economically and from partaking in any work that is likely to be hazardous or to interfere with their education, or to be harmful to their health and detrimental to their physical, mental, spiritual, moral or social development.

We will not co-operate with any company that is involved in child labour and will seek to ensure that all suppliers have the ethical conduct and procedures in place that support this. All companies that deal with us are expected to respect children's rights and to wherever possible help children develop themselves in fields such as education, sports and to develop into good members of society.

Unethical Behaviour

- We will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.
- We will not tolerate harassment or discrimination.
- We will not permit impropriety at any time and we will act ethically and responsibly in accordance with laws.

Enforcement

Any employee found to have violated this policy may be subject to disciplinary action up to and including termination of employment.