

Progress Report



Environment
Human Rights
Labor Law
Fight Against Corruption

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Presentation of the group



The activity of JAL Group has begun in Tunisia in 1993 in Menzel Bourguiba in the county town of Bizerte in the North of Tunisia.

Aware of its responsibilities and its potential, JAL Group Tunisia has committed itself to the path of continuous improvement and relies on its potential and competences to take up all challenges. This has allowed us to reach:

- An investment of 55 million euros for a production power of 39 000 pairs/day
- A covered area of roughly 100 000 square meters
- An employment rate of 4800 employees.

This development policy has allowed us to be the leader in Europe and world-wide in our domain of activity.

JAL Group is nowadays is the absolute n°1 in Europe for the production and the commercialization of shoes of professional safety, with a range of products that meet the requirements of the market.

Present in the entire world, it is the principal protagonist of the European market thanks to a network of branches that covers all Europe as well as commercial organizations present in North Africa, the Middle East, North America, and Australia.

In these countries and only for the year 2007, JAL Group produced more than 10.000.000 of shoe pairs, thus realizing a turnover exceeding the 125 million euros.

JAL Group in Tunisia

Composed of three geographically independent production sites:

ATEL (Industrial Zone of Menzel Bourguiba) Production of shoe stems

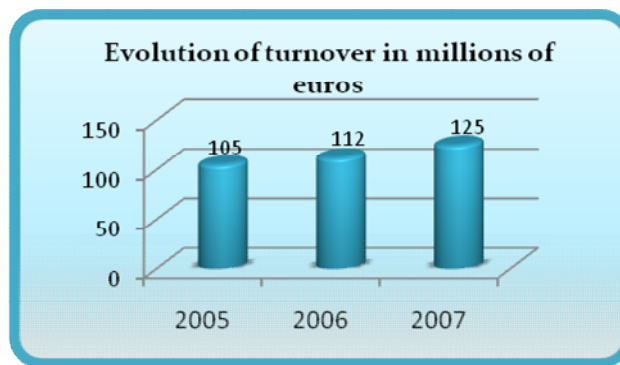
EVOL (Park of economic activities in Menzel Bourguiba) Production of shoes and other shoe components.

JALPOS (Industrial Zone of Menzel Bourguiba) Production of stems and shoes

JAL Group Tunisia represents the principal producer and is the guarantor of the respect of orders from the study of feasibility to the forwarding to the final client.

JAL Group Tunisia concentrates the bulk of its production of safety shoes in these three sites with a capacity of 39.000 pairs per day and a direct employment of roughly 4800 people.

This has earned the group the eight rank among enterprises in terms of export turnover in Tunisia.



General Manager

MARZOUK Karim

JAL Group and the world pact

JAL Group Tunisia registers its social approach in a logic of progress.

In 2005, it has committed itself to the world pact of the United Nations to support and carry out the ten universal principals relative to Human Rights, labor norms, environment, and fight against corruption.

In 2008, JAL Group publishes its first document to report on the progress. This report illustrates the respect of each principle by the presentation of policies and principal measures that contribute to their realization.

JAL Group wanted to adhere to the world pact, thus manifesting its commitment to defend essential values which are Human Rights, labor law, as well as the protection of the environment, while taking into consideration the ten principles of the world pact in its policy and strategy.

The adherence to the world pact falls within the scope of a continuous approach of improvement, an approach which has already begun since 197 and culminated in the obtainment of the certification **ISO9002** in 1999. The general management has immediately engaged the enterprise in an environmental approach. At that epoch, few transport, collection, and recycling enterprises had their approval; JAL Group has therefore expressed its need to its Research and Development Department to study the opportunity to work on the **Ecolabel** of its product in such a manner to reduce the environmental impacts at source.

In 2002, JAL Group was the first company in the county town of Bizerte (North of Tunisia) to be able to obtain a certification **ISO 14001**. In parallel and with the advent of the **2000 version of the norm ISO 9001**, the enterprise has shifted its quality system in 2004 towards this version by the adoption of the process approach.



Immediately after the next year, the concern was to start working in a more pronounced manner on safety. By adopting the specification **OHSAS 18001**, JAL Group wanted to enrich its system of management in order to cover the entire set of risks associated with its activities.

In 2006, JAL Group decided, again voluntarily, to adhere to the **world pact** initiated by the United Nations and to set up a system of management of social Responsibility in conformity with **SA8000**, which complements its system of management of health and work safety.



Principles 1&2

- 1- “Businesses should support and respect the protection of internationally proclaimed human rights; and
- 2- “make sure that they are not complicit in human rights abuses .”

Commitment of the management to the protection of Human Rights

With almost 5000 employees in three production sites, JAL group Tunisia has committed itself towards its personnel to guarantee their protection on all levels.

JAL group respects the international law relative to Human Rights; the internal order of the group is in conformity with the collective convention of leather and shoe enterprises as well as with the Tunisian labor law and protection norms defined by the international organization of labor.

To ensure the respect of Human Rights in our company, JAL Group Tunisia is regularly subjected to social audits from diverse corporations. These audits end up each time with absolute success and satisfactory results which demonstrate the commitment of our enterprise.

Social pacts of certain strategic clients offer the opportunity to JAL Group Tunisia to work on the improvement of the systems of management in terms of quality, environment, safety, and most of all on the social and societal levels.

The initiative of the adherence to the world pact is manifested by a firm

commitment of the management to improve the work conditions of the intervenient parties on the sites of JAL Group Tunisia and to guarantee the respect of Human Rights in the enterprise.

The enterprise has always ensured to apply the rules of good conduct in order to guarantee the safety of its employees and intervenient parties on the site through a strong potential of internal and external communication.

The management of the enterprise is committed to set up a system of management of safety according to the reference system OHSAS 18001:2007

JAL Group Tunisia is committed to ensure the safety of all salaried employees



For JAL Group Tunisia, ensuring the protection of its employees is a priority: a policy of prevention is adopted by the group in order to minimize the risks linked to the work places and to the operations performed on our site. The approach of setting up a

system of management of safety only reinforces our system and our commitment to guarantee the safety of all people.

Reduction of work accident

JAL Group follows a proactive policy which allows a progressive reduction of work accidents.

Since 2005 and following a fine analysis of dangers associated to the activity and thanks to the measures of the enterprise, accidents have never ceased to diminish both in terms of frequency and gravity.

The graphs below illustrating the evolution of these indicators put in evidence the commitment of the group to guarantee the safety of employees and intervenient parties on site.



JAL Group Tunisia and the impact on the community

JAL Group Tunisia is considered in the geographical zone where it operates as a model to follow so much for the direct as well as the indirect employment development, for the local integration, or in addition for the drainage of direct foreign investments directly associated with its activity (manufacture of plastic soles, printing houses and manufacture of cardboard packages, transport and logistics,...)

Besides, many local press articles and TV programs (local and European) have testified to this Tunisian success.

Principle 3

“Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;”

The right to constitute groups, to organize and hold meetings to tackle issues of common importance, is a human right. Engaging a social dialogue in the enterprise is important for the evolution and progress of the group.

JAL Group has at its disposal associations and committees so as to boost work and understanding between the different parties in the enterprise, the principal ones of which are the advisory boards and the boards of health and work safety.

Advisory board of the enterprise

Competent in answering all questions related to the personnel which is subject to the national collective convention of shoe and shoe items industry, the board comprises elected members by the personnel and is composed of permanently appointed members, among which the head of the board, and deputy members representing the personnel. The board ensures the application of the collective convention in the enterprise. It provides suggestions relative to the expectations of the personnel, gives its opinion on promotions, transfers or layoff. It acts as the disciplinary committee, contributes in the establishment of the promotion list, gives its opinion on the allocation of productivity bonuses, and examines the minimal conditions and general rules

of the progress of all the personnel.

Board of health and work safety

Created by the law 94-29 of 21 February 1994 relative to the revision of certain dispositions of the labor code (Article 61), the board of health and work security (CSST) is a technical sub-board of the advisory board of the enterprise.

The board is composed of the head of the enterprise or his deputy, the employees' deputies, the vocational physician of JAL group, as well as the person in charge of the health and work safety.

The board meets every two months and after every dangerous accident occurring in the enterprise so as to analyze the causes and generate pertinent interventions.

This board has the task of managing the program of risk prevention in the enterprise, carrying out investigations after work accidents and/or professional diseases, assuring information activities of sensitization and training for the enterprise employees, and namely elaborating order and prescription projects of safety.

Associative freedom in JAL Group

As mentioned earlier, it is within the framework of associative and social work of JAL Group that there occurred the creation of a football team “L’espoir Sportif of JAL Group” which has as an aim to create a prosperous atmosphere for the development of the relationships between officials and employees and for the promotion of the spirit of appurtenance to the company.



Principle 4

“The elimination of all forms of forced and compulsory labour ;”

JAL Group Tunisia strongly condemns every form of forced or mandatory labor in conformity with the Tunisian labor code.

An internal order in conformity with the national regulation and even respecting certain international regulations is implemented in the enterprise and governs the rights and duties of everybody. In this same context, the employees' contracts clearly mention the possibility of voluntary termination on the part of the employee.

The administrators of human resources of the group undertake a certain number of measures so as to guarantee the total and absolute elimination of all forms of forced or mandatory labor. Social investigations are frequently carried for this aim by the management service of human resources of the group in order to guarantee the application of the labor code so as to delineate certain violations linked to Human Rights, in case they existed. A follow-up of the personnel's complaints is also systematically carried out.

A locking mechanism on the computing level in the software of personnel management is installed in order to signal every excess in time. Every preposition of extra hours is studied in the meetings of advisory boards.

Reinforcing the work done in terms of human resources management and of regulatory conformity, JAL Group starts an approach of setting up the norm of social responsibility in the enterprise SA8000, which stands as a proof of its commitment to a continuous improvement process in terms of conformity with the international requirements both on the social and societal levels.

At the level of purchases

An initial procedure of evaluation of suppliers has been used in the enterprise integrating the social perspective in an initial evaluative questionnaire systematically sent to the suppliers in order to evaluate them more precisely in conformity with the requirements of the norm SA 8000 and with the principles of the world pact while taking into consideration the number of young employees and apprentices, salaries of the personnel and the remuneration of extra hours, types of employees, work hygiene and safety, syndical freedom, negotiation of the remuneration, and social audits of clients.

Principle 5

“The effective abolition of child labour ;”

The Tunisian legislation guarantees the respect of fundamental criteria for the enterprise and its employees among which the abolition of child labor.

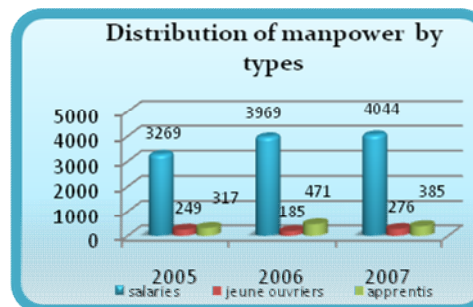
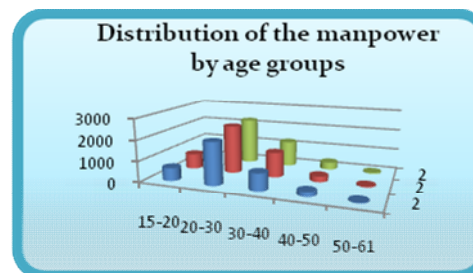
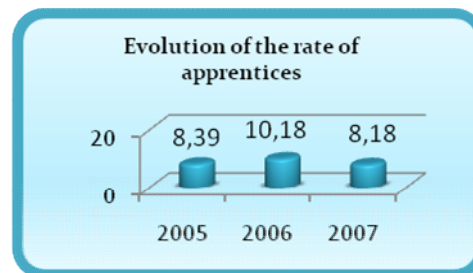
In concordance with these requirements, JAL Group Tunisia effectively prohibits child labor and guarantees a sane and prosperous environment for the hired personnel whiling respecting the imposed age limits.

A system of auto-control is used in JAL Group Tunisia by a computational locking of the management of human resources system which prevents every insertion of personnel dossiers whose ages are inferior to the imposed legal age.

Concerned with the insertion of youths in trainings in order to contribute to the development of apprenticeship capacity of these youths, JAL Group cooperates with regional apprenticeship units and takes into charge the employment of a certain number of apprentices.

A special treatment is given to this category of personnel with an important rate of supervision, a permanent assistance, and qualified trainers on site. To encourage the apprenticeship of the technicality and methodology of work, JAL Group has created an internal training center comprising a complete production cycle of safety shoes.

Equally, the qualified internal trainers organize trainings on many themes such as quality, environment, and health and work safety.



Principle 6

“The elimination of discrimination in respect of employment and occupation;”

JAL Group approach against discrimination

The equality of treatment between men and women in the work place implies the respect of several principles by JAL group:

- Prohibition of discriminations related to hiring.

- Absence of differentiation related to remuneration and career progress.

- Obligations vis-à-vis personnel deputies (elaboration of a written report and negotiation),

- Informing salaried employees and potential employees and setting up prevention measures of sexual harassment in the enterprise.

JAL Group makes no differentiation in the salaries based on sex. A woman occupying the same position as a man and of equal professional value is naturally remunerated like her male colleague. Likewise, no decision concerning training, classification criteria, promotion, transfer, leave, disciplinary sanctions or layoff, can be taken according to belonging to a specific sex.

If there exists differences in the remuneration, they are exclusively based on objective elements, and extraneous to any discriminatory criterion such as the level of training or seniority...

While hiring, no discrimination is exerted. In certain cases, some posts that require particular physical efforts, a certain burly physique, etc...can be attributed to male employees.

Otherwise, JAL Group makes no distinction between salaried employees according to motives based on origin, sex, morals, sexual orientation, age, civil status or pregnancy, belonging or not belonging, whether genuine or assumed, to an ethnicity, nation, or race, political views, syndic or mutualist activities, religious convictions, physical appearance, patronymic, health condition or disability.

Employment of the disabled

The discriminations in employment equally concern the disabled employees. Confronted with the gaze of other people, they lose bit by bit confidence in themselves.

JAL Group respects its disabled employees that represent an important number in the enterprise.

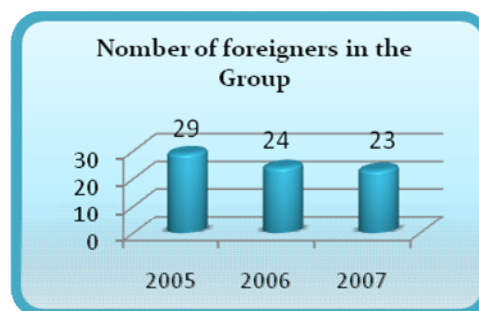


A perfect understanding between employees regardless of their origin

JAL Group employs in its production sites employees of different origins; yet they work in perfect understanding and harmony.

A flawless cooperation between the different protagonists of different nationalities represented by several European countries and Tunisians makes human resources the strength of the enterprise.

No one is discriminated against for ideological, religious, or nationality motives.



Principle 7

“Businesses should support a precautionary approach to environmental challenges;”

Within the framework of its voluntary policy as regards the prevention of environmental risks linked to its activity, JAL Group Tunisia endeavors to deploy all organizational and technological means in order to respect its commitment. The precaution principle can be considered as a basic principle of our policy offers a establishment framework of all our strategies.

Because of its strategic location on the border of the lake of Bizerte, JAL Group adopts a responsible policy vis-à-vis its environment and strives to protect the natural heritage and preserve the fauna and flora; we preserve:

-The aquatic surroundings and hydrous resources by the purification and treatment of used waters, by the control and conformation of used water evacuation systems,....



-The soil, by the control of liquid waste, the prevention and fight against the dumping chemical products, by the selective sorting of solid wastes and the promotion of their recycling and their valorization

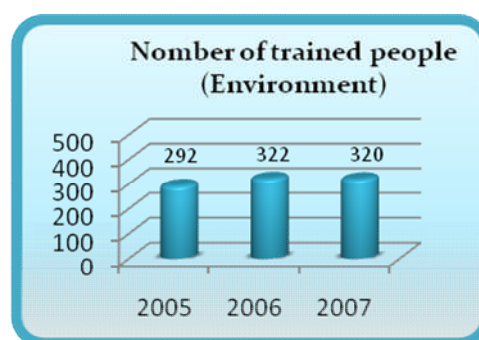
-The air, by the integration of the prevention of atmospheric pollution as a strategic axis of our environmental policy, by an analytical and diagnostic work on atmospheric polluting agents, and by the planning and carrying out of pertinent measures so as to reach the ambitious objectives relative to this axis.

For this purpose and in adequacy with nature and the range of its activities, JAL Group Tunisia installs within its current and future installations control processes which target the elimination and the recycling or the neutralization of these wastes.

This preventive approach is carried out through the installation project of an integrated management system: quality, environment and health & work safety according to the reference systems: ISO 9001:2000, ISO 14001:2004 et OHSAS 18001:2007. This project aims at the spread of an integrated management system on all industrial sites installed in Tunisia. By opting for the certification according to the international norm ISO 14001:1994 since the year 2000, JAL Group Tunisia has taken the initiative of being the first certified enterprise according to this reference system in all the county town of Bizerte (North of Tunisia).

Within the framework of this project, an increased importance has been reserved for the diagnostic phase oriented towards

- the identification and evaluation of environmental risks. This work has implicated the participation and the consultation of a large range of interested parties that cover as many external intervenient parties as internal ones in JAL Group Tunisia.
- By adopting a systematic approach and a continuous improvement dynamics, many preventive measures were undertaken namely:
 - Integration of a new strategic axis in the environmental policy which involves a approach of prevention of atmospheric pollution caused by our activity.
 - Substitution of dangerous chemical products that we utilize by others that are less harmful such as water-based unmolding substances, elimination of toluene and phthalates and generalization of the utilization of thermo-fusible glues; all these products are considerably less dangerous than their equivalents which are made of organic solvents.
 - Generalization of selective sorting of wastes, identification namely of dangerous industrial wastes and elimination in adapted and approved treatment units.
 - Acquirement of production units possessing an integrated recycling technology so as to minimize wastes.
 - Setting up an internal and external communication procedure on all aspects related to our environmental approach (communication on: environmental aspects, the environmental achievements, ...)
- Establishment of energy audits and water systems. Following these audits, control measures of energy consumption has been implemented.
- Establishment and implementation of a management procedure of used chemical products on the production site which cover the phases of: purchase, storage, conditioning, handling, utilization and management of chemical products' residues.
- Arrangement of several covered zones and under retention for the storage of raw materials and dangerous wastes.
- Adherence to the national program of recuperation and recycling of oils "ECO-ZIT". This adherence implies that the entirety of used oils issued from our activity are systematically sorted out and transferred to a regeneration unit. A follow-up of used and transferred oil amounts is carried out and documented so as to ensure the rigor of this approach.



Principle 8

“Undertake initiatives to promote greater environmental responsibility;”

As a citizen responsible enterprise, JAL Group Tunisia, works to institute a more acute awareness of environmental issues.

Following a hierarchization work of its environmental aspects, JAL Group Tunisia has gone forward in ensuring an adequate management of every different type of waste it generates. Whether solid, liquid, or gaseous, all our wastes are internally and externally managed according to a rigorous and exhaustive procedure. So the sorting at source is systematic, the evacuation of residues is ensured by approved carriers, and the final destination of these wastes are treated in recycling and treatment stations recognized by competent authorities.

Our factory of metallic components manufacture is equipped with a recycling station of waters used in the manufacture process. This station which ensures a continuous treatment of water is connected in a closed circuit with the production, which allows a considerable gain in water resources as well as the prevention of hydrous pollution.

JAL Group Tunisia places the control of energy at the heart of its environmental approach. Being aware of the economic aspect that the control of this energetic component brings, of the impact of the reduction of costs of energy consumptions,

of the importance of access to energy, of the weight of energy provision, of the rarefaction of energetic resources in the world namely that of petroleum and the rocketing of barrel prices that have caused the increase of electricity prices, of gas, of water, we have undertaken a certain number of measures which aim at controlling energy. These measures are oriented towards:

- Control of fuel consumptions for the handling engines and cars that we use.
- Reduction in the consumption of electricity and water by the optimization of management methods of installations; the optimization of the maintenance of the machines park and the realization of investments on machines and material that is more effective energetically.
- The realization, during planned intervals, of energetic audits in such a way to detect the progress potential of our energetic achievement and the implementation of improvement plans.

By the communication within its social and economic fabric, by the promotion of an ecological product, and by an active management of its suppliers, JAL Group Tunisia bustles about to transmit an ethics of collective responsibility in terms of respect of the environment.

This approach is singularly oriented towards the promotion of an environmental culture

among the population of youths and children. For that purpose, JAL Group Tunisia periodically organizes open-door days within its industrial sites in order to receive pupils and students of the region. This type of event which gives us the opportunity to explain our practical approach of the preservation of the environment has become a tradition that we tend to keep forever.



- Among these tools we can cite:
- The integration of new competences, the training of internal trainers, the putting at disposal of equipments and appropriate pedagogical tools and the establishment and the realization of a training plan on the control of environmental aspects.
- The creation of a welcome booklet for every new recruit, presenting the company's history and the good practices to follow.
- The creation of internal monthly journals entitled "JAL COMMUNICATION ENVIRONMENT" spreading a culture of awareness on the impact of our activity on the environment and the means of prevention of pollution.



- Internally, whether collective or individual, the communication and the involvement of our collaborators in the environmental approach are essential components of our management spirit.
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- Being aware that the involvement of the personnel constitutes one of the principal motors of development and improvement of our environmental achievements, JAL Group Tunisia has developed multiple tools to satisfy this commitment.

- The spread of objectives associated with our policy Quality, Safety and Environment as well as the applicable requirements related to the environment.
- The communication of our results in terms of environmental achievements.
- A system of suggestion of ideas.
- Success report.

- General and periodical information meetings organized by the management.
- Daily information meetings in the services and workshops
- Consultation of the personnel in the identification and evaluation of environmental aspects and the risks of health and work safety.
- Investigations and analytical meetings after incidents or nonconformities.
- Anticipated analytical and scheduling meetings before the implementation of projects bringing changes to our process.

On the other hand, JAL Group, being one of the most important companies of industrial material in the Northern region of Tunisia, has chosen to play a federalizing role by the organization of experience exchange sessions on the issues of environmental management. By this exchange, we share and transmit to an industry that has just begun being aware of environmental issues a conceptual and pragmatic know-how related to environment.

An approach of systematic substitution of dangerous chemical components has been adopted for our raw materials, and an ecological product having a reduced impact on the environment has been developed and commercialized. This product has been ratified and labeled with an ecological label by the competent European authorities. The promotion of this product fits ambitiously in our commercial strategy and contributes in making customers become more aware of

the importance and benefit of a choice oriented towards products which have the least ecological repercussions and also of the individual and collective responsibility for the product till the end of its life.

With its contractors, whether they are suppliers or subcontractors, JAL Group has followed an approach which targets the development of a mutually beneficial relationship with the formers. So, we work side by side with our suppliers or subcontractors so as they adhere verbally and by actively to our commitment of the prevention of pollution.

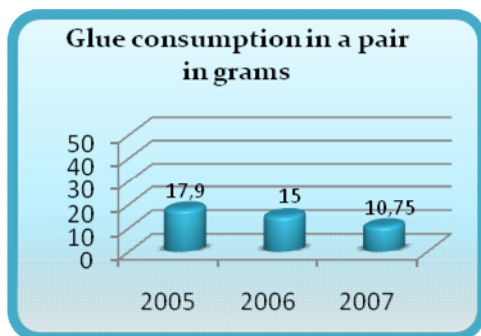
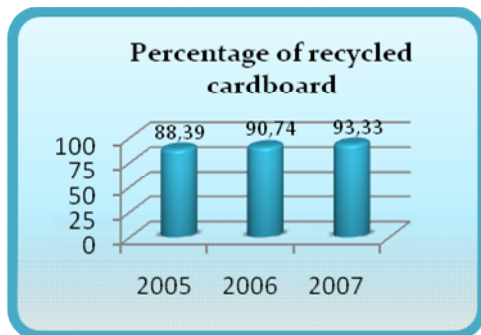
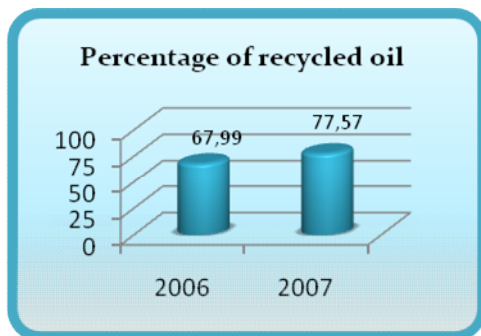
This relationship is possible thanks to a structured communication and an audit process on production sites targeting the insurance of an acceptable environmental achievement as well as a perpetual improvement in this domain.

More precisely, planned and sudden audits are effected for the subcontractors and waste carriers. These audits lead to the establishment of pertinent measures for the conformation and follow-up of wastes from their evacuation from the production site to their treatment or sending towards approved collection centers.

Our environmental policy as well as our applicable regulatory requirements are communicated to each one of our suppliers and subcontractors. Otherwise, for the works done on our site, the subcontractors are informed, sensitized and controlled for the application of our internal procedures of environmental aspects control

On the other hand, in the process of the initial and continuous selection and evaluation of our suppliers, the level of environmental achievement of the formers is taken into consideration as an important criterion and orients the development of our basis of approved suppliers.

→ Obtained results



Principle 9

“Encourage the development and diffusion of environmentally friendly technologies;”

While managing its projects, JAL Group Tunisia has opted for the consideration of technological options that are most friendly to the environment. This strategy was able to be implemented on site by the institution of a procedure which integrates environmental considerations in our management of projects. This consideration particularly implies a systematic evaluation of the opportunities targeting the promotion of technologies that are most friendly to the environment. It is about the procedure entitled “procedure of management of changes” which, during the planning phase of every change able to affect the locations, raw materials, equipments, and processes, provides a favorable team work setting, the reflection and analysis of potential environmental impacts linked to foreseen changes as well as the options that are most adapted in order to limit these impacts.

This procedure was capable of being applied for different projects of which we can cite:

- The setting up of a production unit of TPU (thermo-polyurethane) soles with a choice of a process characterized by zero waste and an integrated recycling system.
- The setting up of a production unit of plastic shells (polyethylene) with a choice of a process characterized by zero waste and an integrated recycling system.

Besides, JAL Group has chosen a purchase policy that is more friendly to the environment and to health and work safety. A progressive substitution of a certain number of chemical products that have a negative impact on the environment and a harmful effect on the health of people is in the process of being realized.

This substitution concerns the benzene, toluene, and phthalates present in certain chemical products used in our industry.

The benzene and the environment

The benzene, by its big toxicity, can cause the death or the reduction in the growth rhythm of vegetation. It can cause damages to the membranes of leaves in diverse agricultural cultivations. The growing effects can be noted two or four days after the fauna or vegetation came into contact with the contaminating agent. The benzene is equally very toxic to all forms of aquatic life.

Toluene and the environment

The toluene can be very mobile when released in the environment; it partly migrates to the atmosphere but its solubility in water is sufficient in order to raise pollution problems of surface and underground waters.

In case of adsorption in the soil, the toluene can pollute underground waters. It is most

of all absorbed on organic matters and clay particles.

The Phthalates and the environment

The phthalates accumulate in the environment and in living organisms; they are endocrine disturbers. They are involved in certain anomalies in the male reproductive system after an exposure in the womb.

Principle 10

“Businesses should work against corruption in all its forms, including extortion and bribery.”

Like all organizations, JAL Group Tunisia is called upon to have an accounting system which displays the use of its employment and the allotment of its resources. This accounting is equally reinforced by an efficient internal control structure. These two structures are guided by an administrative and financial person in charge directly attached to the general management of the group.

The set of financial states of the enterprise integrally reflect, and in all conformity with the local and international accounting norms, a faithful image of the situation of the organization.

JAL Group has thus made of transparency one of the capital values of its commitment. This is concretized by a campaign of accounting and financial audits entrusted to external business agencies pertaining to one of the most known networks in the world.

This transparency goes beyond the accounting framework to engulf our relationships with our clients and our suppliers. We ensure that our reciprocal benefits are within a purely professional framework so as to avoid any kind of corruption or briberies.

The recruitment of our personnel applies to these golden rules too: we always endeavor to diversify the sources of our hiring (employment agency, press listings, internet, specialized corporations...) and the top management of the enterprise takes in charge the control of every dossier of retained candidacy and reserves the right to annul them in case of irregularity.