

COMMUNICATION ON PROGRESS REPORT
UN GLOBAL COMPACT INITIATIVE
2009



ELECTRICAL INDUSTRIES LIMITED

"Doing what we do... Better!"

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HUMAN RIGHTS



LABOUR



ENVIRONMENT



ANTI- CORRUPTION

LETTER FROM OUR C.E.O.

In 2007, EIL signed on to the UN Global Compact's Initiative for corporate social responsibility and obliged to abide to the principles of socially responsible business. We did so because we believe that we all have responsibilities, when it comes to Social, Ethical and Environmental issues. By signing on to this international initiative, we demonstrated our commitment to upholding, encouraging and promoting good corporate principles which will continue as our business expands. Our main objective is to ensure that the 10 principles of the Global Compact forms an integral part of our Company's culture and business development.

EIL recognises that business enterprise is a primary driver for increased productivity and development and these enterprises have a crucial role to play in building prosperous societies. Within this context, we believe that healthy partnerships across the public and private sectors can help spread the benefits for societal development, whilst pursuing our business activities. There is a firm commitment on our part to listen and work with communities in order to better serve the interests of stakeholders over the long-term.

I am therefore proud to submit our first Communication on Progress Report on the developments made in supporting the ten principles espoused by the UNGC during the year 2009.



Mr. Dave Ramkissoon
Chief Executive Officer
Electrical Industries Limited

"...Be the Change you wish to see in the World"

M. Gandhi



While CSR has become one of the buzz words of our time, we at EIL see it as more than just hype and take our social responsibility quite seriously. Corporate Social Responsibility has become prominent in the language and strategy of EIL's business and we are fully committed to ensuring that the principle of CSR becomes embedded, where appropriate, into our policies and practices, to the benefit of staff as well as the wider community.

EIL aims to be recognised as an organisation that is transparent and ethical in all its dealings as well as making a positive contribution to the community in which we operate. We have always emphasized Social Responsibility as one of our Core Values and believe that "doing good" means doing good business.

2010 plans to be a big year in CSR for us, as we plan to develop a comprehensive Corporate Social Responsibility Policy, which would drive our plan to establish a CSR Governance Structure, so as to better articulate our approach to sustainable social investment. This Policy would help us to define our long-term CSR strategy, highlighting our commitment to using innovation in order to create responsible and sustainable solutions.



HUMAN RIGHTS

Since EIL became a signatory to the Global Compact in 2007, we have been consciously supporting the four key pillars of the UN Global Compact as a foundation for sustainable business practice and good corporate citizenship. Our commitment to upholding these four pillars is evident in our Company Policies and Standard Procedures and continuous improvements are being made by all our 285 employees on a daily basis, in every aspect of our operations.

Electrical Industries Limited acknowledges and respects the policies enshrined in the Universal Declaration of Human Rights as well as those of the Global Compact. Our Company Policies reflect our Commitment to conducting our business in an ethical and responsible manner, in accordance with these Principles.

While a Company-wide Commitment Statement regarding Human Rights is an important initiative to be developed during 2010, EIL has already instilled a culture of responsibility where every employee is urged to maintain understanding of how their operations affect Human Rights and to strengthen their dedication to safeguarding such Rights.

Although the Communication on Progress is necessary, reporting of progress and performance may be incomplete since projects still need to be refined and developed so that a structural method of data capture can be established. Additional time is required so that all projects can be fully implemented, projects finalized and initial results achieved.

SYSTEMS IN ACTION

EIL takes all measures in order to remain aware of human rights concerns applicable to Trinidad & Tobago in order to avoid involvement in Human Rights violations. We also maintain compliance with the following Acts of the Republic of Trinidad & Tobago.

- Minimum Wages Act
- Industrial Relations Act
- Workmen's Compensation Act
- Occupational Health & Safety Act

Compensation Benchmarking – This annual exercise serves as a useful tool for fair compensation and to attract and retain talent.

Employee Handbook (Code of Conduct/Ethics) - EIL publishes an annual Employee Handbook which clearly defines our principles and policies to our employees – it outlines what they can expect from the Company and what the Company expects from them. The purpose of the Handbook explicitly states EIL's policies on Employment, Leave, Disciplinary/Grievance Procedures, Code of Ethics as well as Safety requirements.

Employers' Consultative Association – Membership with the ECA provides an invaluable resource in addressing Human Rights Issues.

Fairness & Equal opportunity - All employees at EIL are well-treated, fairly appraised on a semi-annual basis and compensated based on their achievements at work. Equal employment and promotion opportunities are ensured to men and women, individuals of all ethnicities and religions irrespective of their age.

FlexiTime – Flexible working hours intended to support the employee in maintaining a healthy balance between work and family life. EIL believes that only when the employee has struck an effective work-family balance, can they achieve their best.

General Health – EIL has a Sports Club and Gym Facilities which is accessible to all employees in order to promote health and general well-being.

Governance Meetings – As EIL moves towards a participative environment, Departmental Governance Meetings are usually held at least once a month in order to encourage dialogue/feedback from ALL employees. Key issues addressed in these meetings include Employee Issues, individual training plan review, process support, knowledge sharing among others.

Human Capital Development – Using a variety of methods to help our people develop their capabilities – from Knowledge Management and e-Learning to Skills Training.

QHSE Policy – At EIL, “thinking safety and acting safely” helps prevent accidents both on and off the job. We provide a Safe working environment for Clients, Suppliers and Employees, whilst undergoing active training in order to achieve a zero harm environment.

TEMCO Staff Association – The TSA represents the interests of all EIL employees and supports, promotes, and defends employee compensation and benefits, career development, working conditions, and the general welfare of staff members and their families.

Whistle blowing Policy – EIL holds a positive commitment and open approach to whistle blowing and

INITIAL PROGRESS

encourages employees to raise concerns about a dangerous or illegal activity that they are aware of in the organisation.

Annual Risk Assessment – An annual assessment of the risks to health and safety of employees to which they are exposed whilst at work and the protection of the environment according to OSH Act.

Donations – For the calendar year 2009, financial contributions were given to over fifty (50) initiatives within the community and the nation at large.

Employee Health Database - Compilation of a database of employee health, so that the Company may contribute to improving it – 50% Completed.

Employee Satisfaction Survey – EIL greatly values its people, and therefore makes every effort to foster a work environment that is based on respect and open communication. Every year we conduct our Employee Opinion Survey in order to understand and respond to some of the views of our employees. In 2009 the results of the Survey was 74%, while the target was higher, at 80%. The HR Department is therefore taking measures to address issues that have contributed to the company's inability to achieve its goal in Employee Satisfaction.

Governance Meetings – In 2009, the departmental average of governance meetings held was seven (7) per year.

OSHA Compliance – To date, EIL has attained full Statutory Compliance with the OSH Act.

School Visits – Invitations are sent to High Schools, Technical & Vocational Schools as well as the University, so that students can obtain technical knowledge in the manufacture of electrical products. Since this initiative started in 2006, EIL has had 2 visits, annually.

Strategic Management System - Issues relating to human rights have been integrated into the Company's Strategic Management System as part of the HR Department's approach to Learning & Growth within the Organisation.

Trainergy – This new programme, launched in early 2010, allows all employees to log into the company's intranet and access a full schedule of their training plans for the entire year. The total number of training hours for 2009 totaled 1,011 hours, with a monthly average of 84 hours. Thus far, for 2010, our monthly average has more than doubled from that of 2009, and currently stands at 406 hours at the end of February 2010.

THE WAY FORWARD

Code of Conduct/Ethics Training – Training for all employees in 2010.

Commitment Statement– A Document entitled "EIL Safeguarding Human Rights" aims to articulate EIL's position on issues involving human rights and our business.

EIL Internal Newsletter – EIL plans to revive a powerful Knowledge Management Tool – The Company Newsletter will be used to promote internal activities, convey changes to Company Policy, and give praise to those who have made corporate contributions and to relay general corporate information.

Employee Hand Book – Roll out of the revised 2010 Employee Handbook.

Public Support of the GC Principles – EIL plans to publicly support the Global Compact Principles on our website, in public forums and all corporate presentations, in an effort to inspire other organisations to become signatories.

Review the Tendering Process - We plan to review our Procurement Tendering Procedures by possibly including labour standards and health and safety and environmental considerations into our contracting and procurement practices. Additionally, EIL will explore the inclusion of CSR-based questions as part of the contracting and supplier qualification process in order to gauge supplier commitment to human rights and practices. Questions such as:

- Does your company have a Code of Conduct/Ethics?
- During the last 5 years, has your company been the subject of any lawsuits or investigations relating to issues of Human Rights, Labour, Environment, and Bribery/Corruption?

Supplier Engagement & Support - EIL plans to work with Suppliers who share our commitment to the sustainability of Human Rights. We will actively encourage those throughout the Supply Chain to abide by local laws that prohibit acts of key human rights issues such as child labour, discrimination and poor working conditions.

Sustainable Social Investment & Philanthropy – EIL believes that when you eradicate illiteracy, you eradicate poverty. We plan to provide support, employee volunteers and expertise, product donations and other in-kind contributions in supporting community-based projects and NGO's.

- **Building Local Capacity** - By mobilising core competencies within the organization, EIL plans to help build sustainability by supporting the investment initiatives of social enterprises through employee volunteering and sharing corporate expertise.
- **Child Development** - EIL plans to promote child development through awareness-raising campaigns geared at mental, emotional and social awareness. Through our Orphanage Support Programme, EIL will host orphanages during the year, at its Company Retreat Facilities.
- **Lecture Series** – To support education lectures geared at developing young minds in the areas of critical thinking and execution in preparation for the world of work.
- **Regular Donations** – Financial Contributions and in-kind support to local initiatives will be structured in such a way so as to maintain sustainability.



LABOUR STANDARDS

EIL recognises that our most powerful and valuable asset is our workforce. We strive to maintain a work environment that is free from harassment and discrimination, and where we treat employees with dignity, respect, and courtesy.

EIL prohibits discrimination against employees or applicants based on race, colour, religion, age, nationality, physical or mental disability, gender, sexual orientation, marital status, health status, or social or economic class. The Company bases its employment decisions on merit, without discrimination based on any of the factors set out above and expect employees to conduct Company business in a similar manner.

Principle 3

*Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

SYSTEMS IN ACTION

Collective bargaining – Occurs every 3 years or as requested by the TEMCO Staff Association depending on the matter of urgency.

Freedom of Association - EIL is compliant with the Industrial Relations Act which upholds the right of employees to freedom of association and collective bargaining. While no explicit policy regarding the neutral attitude towards trade unions and associations has been developed by EIL, employees maintain fair representation by the TEMCO Staff Association on all labour-related matters.

EIL is also a politically neutral organization whose employees must respect freedom of other individuals and differences of opinions. Employees have a right to express their political beliefs if such discussion does not undermine the political neutrality of the organisation. The same is true in relation to religion.

Industrial Relations Act – EIL maintains compliance with these regulations.

Measurement System – The Company gathers data on the following, relating to TSA activities:

- Outstanding Conflicts

Outstanding Conflicts – In 2009, there were zero (0) outstanding conflicts.

INITIAL PROGRESS

Successful Collective Bargaining – In 2009, collective bargaining by TSA on behalf of EIL Employees resulted in successful negotiation of a new performance & payment structure. EIL supports the freedom of organizing a trade union, however during 2009 employees did not initiate establishment of any organizations or association with Trade Unions.

THE WAY FORWARD

Channel of Communication – Continue to promote regular governance meetings between management and employees.

Principle 4

*Businesses should eliminate all forms of forced and compulsory labour.

SYSTEMS IN ACTION

Contracts of Employment - The issue of compulsory or forced labour at EIL is non-existent. EIL ensures that no employee enters into an employment contract without first understanding that they are not being employed under anything other than free and fair terms and conditions and that they are free to terminate such employment at any time, of their own volition, with appropriate notice.

Industrial Relations Act - EIL maintains compliance with these regulations.

Working Hours – EIL supports the principle of elimination of any form of forced and compulsory labour by establishing a 40-hour work week. While the hours of work will be determined by the employee's departmental requirements, every effort will be made to ensure that an employee's normal hours of work are maintained.

INITIAL PROGRESS

Employee File Audit – Random audits of employee files are conducted to ensure that all new and existing employees have Contract & Supporting Documents on file.

EIL will continue to ensure that employees are never pressured to work overtime, but must do so willingly. In such instances EIL will maintain compliance on the legal limitation of the number of consecutive hours worked.

Principle 5

* Businesses should uphold the effective abolition of child labour.

SYSTEMS IN
ACTION

Age Verification - Upon employment all individuals must submit their personal documents. Human Resource Department verifies the person's age during recruitment and ensures that provision regarding child labour is not violated

Employee Benefits – At EIL, employees are to be remunerated directly and receive such a salary that would ensure an adequate quality of life and conditions for continuous improvement. The average salary paid at EIL is commensurate with the industry standard in Trinidad & Tobago, therefore our employees do not have to force their children to work, and they may allocate funds for education and motivating leisure time of their children.

Industrial Relations Act - EIL maintains compliance with these regulations.

Insurance & Pension Plan – Insurance Policies form part of our employee's total compensation and are intended to provide protection for the employee and their dependents in the event of serious illness, retirement, disability or death.

NO to Child Labour - EIL is directly involved in Manufacturing, and it is known that manufacturing and production facilities are frequently associated with child labour. EIL however strictly prohibits the employ of child labour and will continue to identify and encourage the abolition of child labour within our own supply chain.

Workmen's Compensation Act - EIL maintains compliance with these regulations.

INITIAL
PROGRESS

Employee Benefits - EIL contributes 2/3 of the total premium for Group Health and the entire premium for Group Life and a 5% contribution to the Employees' Pension Plan.

Employee Assistance Programme - EIL recognises that there are times when personal problems can affect the employee's well-being and performance. Due to this concern, EIL has established an EAP to provide assistance to employees and their immediate family during times of need. This programme provides professional counseling services that are designed to help resolve personal problems.

Emergency Relief Programme – This programme offers financial assistance to weekly-paid workers in times of emergency. It is funded 50% by the Company and 50% by weekly and monthly paid employees via a weekly contribution of \$1.25.

Soft Loans – All weekly paid employees can access a Soft Loan from a \$10,000.00 float. Applications must be submitted to the HR Department.

THE WAY
FORWARD

Commitment Statement – We plan to develop and implement a commitment statement, highlighting our support in the fight against child labour. We aim to support other organisations within our supply chain in identifying and encouraging the abolition of child labour, thus promoting best practice and raising standards of labour, nationally.

Measurement Systems – Efficient and effective data capture of all initiatives in order to successfully report on their performance.

SYSTEMS IN
ACTION**Industrial Relations Act**

Performance Appraisals – As part of an employee’s career development and compensation for achievements, all employees are subject to an annual performance review. The Performance Appraisal system is used as a guide to offer special incentives and also to direct management’s decisions in promoting employees and awarding salary increases.

Recruitment & Selection Policy - EIL supports the principle to eliminate discrimination in respect of employment and occupation. Our policy clearly defines the procedure of personnel planning, search and selection. Our Policy states that employees are selected in accordance with their education, competence, professional qualifications, advancement potential and character without reference to race, colour, class, or gender.

INITIAL
PROGRESS

Internal Selection - During the selection period, priority is given to EIL employees if they meet the requirements for the vacant position. If no adequate employees are found inside the Company, an external search is conducted. Job ads do not specify sex or age of the potential candidate, only qualification requirements. Interviews are based solely on information contained on a candidate’s résumé.

THE WAY
FORWARD

EIL Leadership Programme – EIL strives for “Diversity in Leadership”. As such, particular emphasis is being given to improving diversity at the Leadership and Managerial Levels with respect to gender, ethnic diversity and addressing barriers to age diversity.

Review application Forms – Application Forms are to be reviewed and/or revised in order to ensure that no bias exists, and if it does, ensure that it is removed.

Revise Employee Opinion Survey – The Employee Survey Form will be revised to include a section about discrimination in the workplace.



ENVIRONMENT

With today's focus on environmental impact and carbon footprints, it becomes imperative to not only reduce wasted resources, but also to do so in a manner that doesn't negate such savings. EIL is therefore committed to a policy of sound and responsible environmental management, leading to a sustainable use of resources and optimal management of waste. We are dedicated to responsible environmental policies in all our operations and full compliance with environmental laws and regulations.

EIL integrates responsible environmental policies, programs and practices into our operations as an essential element of management. As such, we are constantly educating, training and motivating employees to conduct themselves in an environmentally responsible and safe manner. To accomplish our environment-related objectives, EIL:

- Plans, maintains and operates facilities to ensure compliance with environmental laws and regulations;
- Trains and motivates employees to conduct their activities in an environmentally-responsible and safe manner.

SYSTEMS IN ACTION

Environmental Management Act

- Water Pollution Rules
- Noise Pollution Control Rules
- Trinidad & Tobago Waste Water Management Act 2001

EIL has the necessary environmental permits and authorisations to operate, from the relevant authorities and has a systematic approach in place to ensure knowledge and compliance of new environmental legislation and any other legal environmental requirements.

Quality Management System – EIL is committed to a Policy of responsible resource usage and environmental management resulting in sustainable and efficient management of resources and waste. EIL seeks to minimize its production of waste and use of energy through our Quality Management System.

ISO 9001:2008 specifies requirements for a quality management system. EIL is committed to implementing quality management systems and processes that would enable the delivery of the highest quality products and services. The QMS Policy outlines the quality system, documentation structure, procedures and business practices which are used by EIL to achieve our vision and ensure that our customer's requirements are satisfied.

INITIAL PROGRESS

Annual Testing – Laboratory testing, conducted by a certified Party, assesses all industrial effluent, as well as Indoor Air Quality, Heat Stress & Noise, as part of regulatory requirements. EIL has, to date, passed all required testing and is in full compliance with all relevant Statutory and Environmental & Health regulations.

Risk Assessments – EIL currently undertakes an annual Risk Assessment, conducted by an Independent Certified Party, the results of which are available to stakeholders. In 2009, Workplace Hazard Observation & Occupational Risk Assessments were conducted and specific recommendations were made with respect to preventive measures and controls to be implemented for the mitigation of risks.

Free Seminars – Persons involved in the electrical field are invited to a free seminar, hosted annually, where they are sensitized to various methods and products related to energy-efficiency. For the period 2007-2009, a total of 3 seminars were hosted, where over 1,200 individuals were educated on topics related to sustainable energy-efficient technologies.

Industrial Water Filtration System – Industrial sources of waste water requires specialized treatment processes, especially when it is in close proximity to local water sources. EIL ensures that our industrial effluent undergoes all the necessary monitoring & testing and that it is properly disposed of by a certified environmental company.

Implementation of QHSSE Management System - EIL's QHSSE Management System provides the framework for structured management of all QHSSE issues. We have achieved 100% completion of required documentation and 40% completion in the implementation stage.

Internal Quality Audits - Internal audits are scheduled throughout the year as part of the ISO 9001:2008

requirements. For 2009, 19 ISO Internal Audits were conducted, covering all departments.

Membership on the NATIONAL TECHNICAL COMMITTEE FOR ELECTRICAL ENGINEERING – EIL is an active member of the Technical Committee - a joint Committee of the Board of Engineering of Trinidad & Tobago and the Trinidad & Tobago Bureau of Standards.

Paper Recycling Initiative – Conveniently-placed recycling trays that are located close to Printers, allow employees to collect and re-use one-sided paper for printing or to make scratch pads. On average, EIL saves approximately 80 lbs of paper on a monthly basis, through this initiative.

QMS Reporting - EIL has established and maintains documented procedures for the systematic and independent examination of its Quality Management System to determine whether activities and results comply with planned arrangements and to determine Quality Management System effectiveness.

Remediation of Copper Sludge – All coolant is recycled as much as possible, and then the remaining copper sludge is properly disposed of by a certified environmental services provider. Using an inverted combustion furnace, the impurities are burned off and then chemical processes may be added in order to make the residue earth-friendly.

Safety Committee – Responsible for review and oversight of the Corporate QHSSE Policy. The Safety Committee communicates the Risk Assessment to all Stakeholders as well as submits monthly Statutory Reports to OSHA and the EMA.

Water Management System – Management of Water Usage, including Preventive Maintenance, is part of the PM5 System, and helps prevent wastage such as hose leaks.

THE WAY FORWARD

CSR Champions – As part of the Corporate CSR Governance Structure, the CSR Steering Committee, would provide overall strategic guidance for the CSR Champions, who will be responsible for the implementation of the various CSR activities. The key role of the CSR Champions is to identify key issues and to implement the CSR framework in a way that suits CSR needs and priorities.

The “Green Room” – This feature will be implemented on our Corporate Website, as well as be featured on the company’s Intranet. It will be a direct link to comprehensive environmental information as well as energy conservation tips, energy-saving solutions & technology as well as EIL’s “Green Initiatives.”

“Think Green” Initiative – As the EIL business grows, we want to ensure that we minimize our impact on our planet. As 2010 progresses, EIL will embark on several green initiatives in order to implement innovative and responsible environmental practices across our company, thus reducing our carbon footprint and helping our employees “to live and think green.” Several initiatives are planned for 2010, some of which are:

1. “Bottle Bank – Conveniently placed recycle bins would be a collection point for glass bottles, which would then be taken to the local glass manufacturer for recycling. This initiative would greatly reduce the amount of waste on our landfills.
2. Plant-a-Tree Initiative – Since climate change is one of the biggest environmental issues plaguing our planet, we see the planting of trees as the most natural way of reducing our carbon footprint.
3. Adopt-a-Beach Campaign – A coastal environmental initiative, involving our employees along with members of the community, to embark on a beach clean-up exercise.
4. Community Out-Reach Programme – The purpose of this programme is to heighten community awareness to our employees and to get them involved in projects within disadvantaged areas of the community that would help make a difference.

5. “An Evening on the Greens” –Fund-raising events, hosted in a rural landscape, would draw attention to the natural surroundings which we need to protect. Proceeds from this event would be used to support an environmental project.

Principle 9

* Business should encourage the development and diffusion of environmentally-friendly technologies

SYSTEMS IN ACTION

Intranet - All work related documents and information for employees are placed on the intranet. In 2000, absolute access to this information was ensured to all employees, therefore the need to circulate hard-copy documents was eliminated.

Nation-wide Retrofitting Programme – Through an effective Lighting Audit, EIL helps business owners upgrade lighting fixtures and controls to more energy efficient Technologies. Lighting Retrofit technology helps achieve environmental synergy through energy-efficient lighting fixtures installed at commercial centers, industrial sites, schools and homes. The realized benefits are substantial and can be summarized as follows:

- **Energy-savings** - Through the use of energy-efficient Lamp and ballast technology,
- **Pollution reduction** – A Lighting Retrofit Project consumes less electricity and thus helps reduce CO2 emissions associated with power generation.

INITIAL PROGRESS

Capacitor Bank - We have been undergoing research into the installation of a Capacitor Bank to provide reactive power for power factor correction. Power factor correction at lower levels provides an increase in electrical system capacity. One of the main advantages that can be achieved by applying the correct power factor correction are:

1. Environmental benefit-reduction of power consumption due to improved energy efficiency. Reduced power consumption means less greenhouse gas emissions and fossil fuel depletion by power stations.

THE WAY FORWARD

Our aim is to analyse the environmental aspects of our business and its products and services, with a view to understanding how other environmentally-friendly technologies could be utilised more effectively within our Company.



TRANSPARENCY & ANTI-CORRUPTION

EIL has a strong commitment to high ethical standards. Every day employees may be faced with challenges that test their ethical principles. We are a firm supporter of ethical business principles and expect all our employees to behave in a professional, ethical manner, whether dealing with colleagues inside the company, or with customers, suppliers or other external organisations and individuals.

SYSTEMS IN ACTION

Code of Conduct - EIL's Code of Conduct Policy provides employees with a set of standards meant to promote honest and ethical behavior in the conduct of the Company's business. Employees, in discharging their duties, have a legal obligation to act honestly, ethically, in good faith and with the best interests of the Company in mind.

Codes of Ethics (Managers) – Managers have a professional responsibility to conduct themselves so that their good faith and integrity shall not be open to question.

Conflict of Interest – This issue is addressed as part of the Code of Conduct Policy as well as incorporated into the Employee Handbook. The Policy recognises that although employees' have the right to engage in activities outside of their employment, such activities should not, in any way, conflict with the Company's business. It then proceeds to identify activities from which the employee must refrain.

Internal & External Audit System – We have developed an effective Internal Audit System that monitors the internal control process. Together, the internal and external auditors secure assurance concerning the state of the organisation's internal controls.

Whistle-Blowing Policy – This Policy is in line with our commitment to Integrity and Social Responsibility. Employees are able to raise concerns about illegal activities that they are aware of in the workplace, such as malpractice, criminal offences, non-compliance etc.

INITIAL PROGRESS

EIL always strives to adhere to high standards of ethical business practice and would not enter into any agreements or negotiations where bribery or corrupt standards are being applied.

THE WAY FORWARD

Code of Conduct/Ethics Training – Training for all employees in 2010.