

IPPAG Global Promotions Corporate Social Responsibility Code of Conduct

Introduction

IPPAG Global Promotions is committed to behave in a socially and ethically exemplary way. We are signatories to the UN Global Compact, members of Sedex, and believe that we are responsible for all the people who take part in the production and support of our products and services worldwide. We also believe that actions speak louder than words.



Ethical Policy

IPPAG expects employers to respect fundamental human rights, to treat their workforce fairly and with respect. In order to make our position clear we have documented an Ethical Policy based on the EPPA 'European Promotional Products Association' industry specific Code of Conduct, that has been chosen for its International value. Please see below.

Implementation

Due to the diverse nature of our business, which involves global sourcing, there are many requirements which we purchase directly from factories in both high and low risk countries (Maplecroft definition) in addition to small urgent requirements where we purchase from local wholesalers and use local printers and embroiders. On this basis we need to have a multi-tiered strategy for implementing our Ethical Policy, which is controlled through our preferred supplier network.

For suppliers based in High Risk countries

Independent third party audits are conducted on our preferred suppliers and we ensure they achieve reasonable evaluations before any work is contracted. On this basis IPPAG can and will provide copies of these audits, which we hold on file.

We have a good number of our factories with up to date SMETA (Sedex framework), BSCI and Wrap audits and can offer a combined BSCI/SMETA/WRAP compliance solution if required.

For suppliers based in Low Risk countries

All our preferred suppliers must sign a Conditions of Purchase agreement before we conduct business, which in summary, confirms the following.

1. The supplier is prepared to abide with the Ethical Policy below and ensure that any third party suppliers in the supplier's supply chain also comply with our Ethical Policy.
2. Any major breaches of non-compliance either in their facilities or in third-party supplier facilities must either be rectified promptly or breaches reported to IPPAG in writing promptly.
3. The supplier must also be prepared to demonstrate they are implementing the Ethical Policy with any third party suppliers. There are three options for demonstrating implementation.
 - i. Third party independent auditing.
 - ii. Internal auditing if thorough and established procedures are in place.
 - iii. 'Self-certification' for factories in Low Risk countries.

If the supplier fails to comply with either of the above, we may, at our sole discretion terminate any agreement or contract that it has with the supplier with immediate effect.

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IPPAG Global Promotions Ethical Policy

We believe we must not only meet the expectations of our customers and consumers, we must exceed those expectations. To that end, we have adopted standards for the safety, quality and integrity of our products and processes and we are committed to respecting the rights of individuals and the environment. We are dedicated to complying with all applicable (local) laws and to conduct business in an ethical and responsible manner.

Law & regulation

We will comply with all applicable (local) laws and regulations. We will meet applicable recognized voluntary industry standards for our products and processes.

No child labor

We will not use child labor. We will comply with all minimum age provisions of applicable laws & regulations.

No abuse of labor

We will not tolerate any form of forced labor or labor, which involves physical or mental abuse or any form of mental or corporal punishment.

Workplace conditions

We will provide a safe, healthy and secure workplace. We will abide by all applicable (local) laws and regulations for safety and health.

Freedom of Association

We recognize and respect the freedom of our employees to choose whether to associate or organize with any group of their own choosing. If employees are represented by an organization recognized under (local) law, we respect the right to bargain collectively.

No exploitation, discrimination or intimidation

Under no circumstances will the exploitation of any vulnerable individual or group, discrimination and/or intimidation be tolerated.

Working hours and wages

We will comply with all applicable wage, work hours, hiring, benefits, and overtime laws and regulations. In the absence of a law in a particular location relating to product safety, labor, employment, environment or working conditions, the spirit and intent of these policies shall be met.

Subcontractors and sources

We will only do business with likeminded partners that have a natural respect for our ethical standards as stated in our Corporate Social Responsibility Code of Conduct. All subcontractors and suppliers are required to comply with all applicable (local) laws and regulations.

This code of conduct is an integral part of our company's day-to-day management process and we maintain all necessary information systems to achieve this objective. We also expect our business partners to develop and implement internal business procedures to ensure compliance with our policy.

The provisions of this code constitute minimum and not maximum standards and all companies applying this code are also 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.

Mike Oxley, CEO, IPPAG Global Promotions