

IPPAG Global Promotions Corporate Social Responsibility Code of Conduct

Introduction

IPPAG Global Promotions is committed to behave in a socially and ethically exemplary way and we 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 Ethical Trading Initiative. 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 full and up to date SMETA compliance solution as 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 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.

Mike Oxley, CEO, IPPAG Global Promotions

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IPPAG Global Promotions Ethical Policy

Ethical Trading Initiative Code of Conduct

1. EMPLOYMENT IS FREELY CHOSEN

- 1.1 There is no forced, bonded or involuntary prison labour.
 - 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.
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2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
 - 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
 - 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
 - 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.
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3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. 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.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. CHILD LABOUR SHALL NOT BE USED

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. LIVING WAGES ARE PAID

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 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 expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. WORKING HOURS ARE NOT EXCESSIVE

- 6.1 Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
- 6.2 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. 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.

7. NO DISCRIMINATION IS PRACTISED

- 7.1 There is 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.
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8. REGULAR EMPLOYMENT IS PROVIDED

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 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.

9. NO HARSH OR INHUMANE TREATMENT IS ALLOWED

- 9.1 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 provisions of this code constitute minimum and not maximum standards. 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