

ORIENTAL PRESS

COMMUNICATION ON PROGRESS (COP)

2015 (JAN – DEC)

**GLOBAL COMPACT
PROGRAM OF
UNITED NATIONS**

INDEX:

SR.	DESCRIPTION	PAGE
1	10 PRINCIPLES OF GLOBAL COMPACT	1
2	SCOPE OF COP	2
3	THE ORIENTAL PRESS	2
4	STATEMENT OF DIRECTOR	3
5	COP: HUMAN RIGHTS	4
6	COP: LABOUR	8
7	COP: ENVIRONMENT	12
8	COP: ANTICORRUPTION	18
9	ANTI-BRIBERY POLICY	19
10	SEDEX STANDARDS (ETI Base Code)	21

The Ten Principles

The UN Global Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption enjoy universal consensus and are derived from:

1. The Universal Declaration of Human Rights
2. The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
3. The Rio Declaration on Environment and Development
4. The United Nations Convention Against Corruption

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

SCOPE OP COP:

This COP is limited to the period ended Dec 31, 2015 (last report submitted in April 2015 which was limited till Dec-2014)

THE ORIENTAL PRESS (Operating name of ORIENTAL PRINTING GROUP):

Oriental Printing Group was established in 1952 and then re registered in 1982. Our head office is in Bahrain where we have 2 plant specialising in commercial and security printing. On site there are facilities for litho and commercial printing along with controlled overt and covert security features, with full finishing and binding capabilities.

We also have a factory located in the Jebel Ali Free Zone, Dubai. This site is primarily focussed on book production. In Dubai we are facilitated to produce hard back, with printed case or imitation cloth, jacket, paperback, flexibound and wiros bound with a variety of finishes and bindings.

Our factory site in Bahrain is 230,000 sq ft and in Dubai 151,000 sq ft. For the past three years we have produced about 20 million books annually at our Dubai factory. Across both sites we employ about 450 personnel.

There are dedicated sales and marketing teams based in Bahrain and UK speaking: Arabic, English, French, Spanish and Hindi.

OPG are fully FSC, PEFC certified as well as ISO 14001:2004 EMS.

We are also able to readily source and supply environmentally recognised PREPS graded papers that are presently widely used within the publishing and printing industry.

The factory is annually audited by independent auditors of Sedex, ISO 14001:2004 and FSC and PEFC.

Our products are regularly safety tested by our clients to meet EU and North American import safety standards. If required we can produce and supply a chemical and component breakdown.

http://www.oriental-press.com/page.php?content=company_profile

STATEMENT OF DIRECTORS:

Statement of Managing Director of Oriental Press pledging continued support to Global Compact Programme of United Nations

The Oriental Press is committed to continue rendering support to the United Nations Global Compact Programme and will Endeavour to abide by the ten Principles of the programme, most of which are a part of our Vision and Mission Statements. Therefore, the company continues to pledge support to the programme through its policies, processes, products and services. In line with our commitment towards Global Compact Program, we are committed to introduce printing processes that supports environment and we are proud to explain that we are using FSC, PEFC paper for printing; also we have introduced online proofing that has reduced consumption of paper, ink/cartridge, fuel resources as well as emission of gases etc. Additionally, Oriental Press is affiliated with SEDEX (International Organization working towards Health & Safety of labor). Oriental Press has its written policy for Anti-Bribery and management is committed for zero tolerance regarding violation of Anti-Bribery Policy. Management of Oriental Press is committed to be transparent towards presentation of our activities & operations.

Mr. Mohammad Al Zeera

**Managing Director
Oriental Press**

COP: HUMAN RIGHTS

Principles

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Policy/Commitment

Oriental Press has always had a concern for Human Rights in their business. Oriental Press recognizes that Human Rights are an integral part of corporate citizenship and we respect and support the UNGC's principles on Human Rights and Universal Declaration of Human Rights. Our commitment entails that we work continuously to improve our social performance by setting high objectives and integrating human rights considerations into our daily business.

System of implementation:

1. Oriental Press is adhered to UAE and Bahrain's Labor law as well as all rules related to labor/Human rights introduced by law of the land.
2. Being affiliation with SEDEX, Oriental Press is fully supporting standards of SEDEX (SEDEX is based on ethical and responsible practices covered by ILO Conventions, ETI Base Code, SA8000, ISO14001 and industry specific codes of conduct). Sedex has deferent rules and annual audit by independent auditor is required by SEDEX. These rules called "ETI Base Code".
3. Internal Auditing by a full time Internal Auditor/Management Representative

Activities:

1. Continued preparation for compliance with requirements for Trading License requirement (which includes: maintenance of hygienic environment, staff training for first aid & fire fighting, fire drill, medical facility of staff, timely

- payment of salary, providing proper health & safety equipments)
2. Continuous monitoring by top management (quarterly review meeting with managers and open door policy).
 3. Annual SEDEX Audit by independent third party.
 4. Continuous observations by internal Auditor.
 5. Providing First aid & Fire Fighters training to the representative of production departments.
 6. Conduct emergency drill event on regular basis
 7. We have provided appropriate internationally acceptable housing facilities to the employees who chose to stay in the company accommodation.
 8. Provided timely First Aid Training to the 2 groups of staff to respond health emergency (one group in UAE and another group in Kingdom of Bahrain).
 9. Provided timely Fire Fighters training to the 2 groups staff to respond emergency at industrial site (one group in UAE and another group in Kingdom of Bahrain). Also conducted annual emergency drill during 2014
 10. All accommodation and factory areas are equipped with a first aid kits, fire extinguisher, smoke detector, emergency torch light and whistle etc.
 11. Our staff is covered for group medical as well as workmen compensation insurance to overcome any health and safety risks.
 12. Our staff has direct access to communicate with the higher management regarding any issue.

Result:

1. Oriental Press has fully adhered to all applicable laws of Kingdom of Bahrain & UAE (there is no legal notice/fine neither from the government of UAE nor Kingdom of Bahrain).
2. Annual Audit of SEDEX conducted by independent auditor during Nov-2015 (covering Jan-Oct 2015) and identified 1 observation (before 5 observations). We are fully committed to ensure improvement to have no more observations for the forthcoming period.

Sedex Audit summary for Observations/Non Conformity (Year 2015)



Sedex Members Ethical Trade Audit (SMETA) Report (Version 5.0 Dec 2014)

Non-Compliance Table

Issue (please click on the issue title to go direct to the appropriate audit results by clause)	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)			Record the number of issues by line*:		
	ETI Base Code	Local Law	Additional Elements (i.e. not part of ETI code)	NC	Obs	GE
0 Management systems and code implementation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
1 Employment Freely Chosen	<input type="checkbox"/>	<input type="checkbox"/>				
2 Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>				
3 Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		01		
4 Child Labour	<input type="checkbox"/>	<input type="checkbox"/>				
5 Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>				
6 Working Hours	<input type="checkbox"/>	<input type="checkbox"/>				
7 Discrimination	<input type="checkbox"/>	<input type="checkbox"/>				
8 Regular Employment	<input type="checkbox"/>	<input type="checkbox"/>				
8A Sub-Contracting and Homeworking		<input type="checkbox"/>	<input type="checkbox"/>			
9 Harsh or Inhumane Treatment	<input type="checkbox"/>	<input type="checkbox"/>				
10A Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>			
10B2 Environment 2-Pillar		<input type="checkbox"/>	<input type="checkbox"/>			
10B4 Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>			
10C Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>			

*Please note the table above records the total number of Non compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.

Audit company: Accordia Global Compliance Group Report reference: OP/31/10 & 01/11/2015
Date: 31st Oct & 01st November 2015

3

Sedex Audit summary for Observations/Non Conformity (Year 2014)



Sedex Members Ethical Trade Audit (SMETA) Report (Version 5.0 Dec 2014)

Non-Compliance Table

Issue (please click on the issue title to go direct to the appropriate audit results by clause)	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)			Record the number of issues by line*:		
	ETI Base Code	Local Law	Additional Elements (i.e. not part of ETI code)	NC	Obs	GE
0 Management systems and code implementation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00
1 Employment Freely Chosen	<input checked="" type="checkbox"/>	<input type="checkbox"/>		01	00	00
2 Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
3 Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		02	00	00
4 Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
5 Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
6 Working Hours	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		02	00	00
7 Discrimination	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
8 Regular Employment	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
8A Sub-Contracting and Homeworking		<input type="checkbox"/>	<input type="checkbox"/>	00	00	00
9 Harsh or Inhumane Treatment	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
10A Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>	00	00	00
10B2 Environment 2-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	00	00	00
10B4 Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	00	00	00
10C Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>		00	00

*Please note the table above records the total number of Non compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.

Audit company: Intertek Report reference: AUD15063

Date: 11.12.14/02/14

3

COP: LABOUR

Principles:

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Policy/Commitment

Oriental Press is committed to adhere the labour rights as applicable in UAE and kingdom of Bahrain. Additionally we support labor rights addressed in SEDEX guideline.

Oriental Press stands committed not to resort to any form of forced and compulsory labour.

Oriental Press is against the illegal use of child labour, exploitation of the work of children and all other unacceptable forms in the treatment of workers such as the use of child labour, physical punishment, female abuse, and forced labour and other forms of abuse

Oriental Press has the permanent concern to respect and promote the principle of nondiscrimination on all the levels of our Human Resources, with special emphasis on: recruitment, career development and training. With this intention, we commit not to practice any form of discrimination, that it is founded on the age, the sex, the religion, origins (social and ethnic), political affiliation or trade-union membership, race or color etc.

System of implementation:

1. Rules of JAFZA, labor law of UAE and labour law of Kingdom of Bahrain.
2. Labour rights addressed in the guideline of SEDEX
3. Internal Audit Department
4. Management's factory monitoring is part of our strategy to improve working conditions. Management is closely monitoring the system that provides with firsthand insight into factory conditions and serves as an important tool to measure factory progress against our standards. Monitoring provides us with regular data about factory conditions and a mechanism to assess the impact of our efforts over time.

Activities:

1. Each employee has a contract of employment stating the terms and conditions of service
2. Suggestion/Complaint boxes made available where staff is welcomed to raise complaints, contribute suggestions for improvements etc.
3. Each staff has easy and direct access to top management regarding any issue.
4. Conducting annual audit of SEDEX by independent third party.
5. Continuous observations by internal Auditor

Result:

1. Oriental Press have never been charged with, indicted for or in any other way whatsoever involved with the use of slave labour
2. There is no (zero) forced or compulsory labour.
3. There is no child labour in Oriental Press Group. The minimum age of our staff is **19 Years**
4. There is no discrimination in case of employment and occupation. Our staff belongs to 12 different countries of the world including India, Pakistan, Bangladesh, Srilanka, Philippine, Syria, Egypt, UK, Bahrain, Nepal, Mauritania and Iran, our staff belongs to various religious beliefs/sects including Muslims, Hindu, Christian and Buddhist, our staff ranges between different age groups. Graph/Chart:
5. Our staff is satisfied with the environment and policy provided by Oriental Press. The evidence is based on the structure below:
 - 26% staff serving since last 11-32 years
 - 34% staff serving since last 6-10 years
6. Each staff is ensured to have 1 day weekly rest.
7. Annual Audit of SEDEX conducted by independent auditor during Nov-2015 (covering Jan-Oct 2015) and identified 1 observation (previously 5 observations). We are fully committed to ensure improvement to have no more observations for the forthcoming period.

Sedex Audit summary for Observations/Non Conformity (Year 2015)



Sedex Members Ethical Trade Audit (SMETA) Report (Version 5.0 Dec 2014)

Non-Compliance Table

Issue (please click on the issue title to go direct to the appropriate audit results by clause)	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)			Record the number of issues by line*:		
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8 Regular Employment	<input type="checkbox"/>	<input type="checkbox"/>				
8A Sub-Contracting and Homeworking		<input type="checkbox"/>	<input type="checkbox"/>			
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10A Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>			
10B2 Environment 2-Pillar		<input type="checkbox"/>	<input type="checkbox"/>			
10B4 Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>			
10C Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>			

*Please note the table above records the total number of Non compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.

Audit company: Accordia Global Compliance Group Report reference: OP/31/10 & 01/11/2015
Date: 31st Oct & 01st November 2015

3

Sedex Audit summary for Observations/Non Conformity (Year 2014)



Sedex Members Ethical Trade Audit (SMETA) Report (Version 5.0 Dec 2014)

Non-Compliance Table

Issue (please click on the issue title to go direct to the appropriate audit results by clause)	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)			Record the number of issues by line*:		
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10B4 Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	00	00	00
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Audit company: Intertek Report reference: AUD15063

Date: 11.12.14/02/14

3

COP: ENVIRONMENT

PRINCIPLES

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Policy/Commitment

Oriental Press supports the concepts of a precautionary approach to environmental challenges, promotion of greater environmental responsibility and development and diffusion of environmentally friendly technologies.

Oriental Press is dedicated to contribute to the enhancement and sharing of knowledge within the globe by printing superior quality books. In line with this purpose, the company is also committed to protect the environment and prevent pollution while doing its daily work.

System of implementation:

1. ISO 14001:2004 Environmental Management System which rewards responsible and effective ecological behavior.
2. The Forestry Stewardship Council (FSC) Chain of Custody.
3. Programme for the Endorsement of Forest Certification (PEFC)

Activities:

1. Procuring materials like paper, ink and chemicals from environmentally responsible suppliers.
2. Continually looking for means of reducing waste in all areas.
3. Minimize waste by introducing a latest technology, new ways of printing, wherever possible.
4. Selling all waste/scrape to the recycling companies
5. Segregation and Handling of waste as per EMS system

6. Disposing unsold (and garbage) waste as per authorized procedure of the law of land.
7. Utilize cost effective solutions for lighting requirements.

Results:

1. Annual FSC audit-2015 conducted by certifying company and issued audit report with 3 non-conformities. We are fully committed to improve the control/monitoring system to ensure there is no NC.
2. Successfully passed annual audit of PEFC (Program for the Endorsement of Forest Certification) with no NC.

Please refer to next page for copy of PEFC audit letter 2015

PEFC Audit letter (April 2015)

Alko-Cert *Wir sind für Sie da!*

Alko-Cert GmbH · Wollgrasweg 31 · 70599 Stuttgart

Oriental Press, Dubai
Mr. Siraj Ahmed
P.O. Box 16916
Jebel Ali Free Zone, Dubai
UAE

01.09.2015

Results of the PEFC CoC-Audit of 18th April 2015

Dear Mr. Siraj Ahmed,

I'm very happy to send you congratulations for the fabulous result of the annual PEFC CoC surveillance audit – there have been no nonconformancies at all!

Therefore the certificate will be kept valid and you can continue to use it.

For the scheduling of next years' surveillance audit our auditor will contact you in time.

If you have any questions don't hesitate to contact me.

Thank you very much for the good cooperation and your order!

Best regards from Germany!



Dr. Annette Skipiol
Managing Director

Alko-Cert GmbH
Wollgrasweg 31
70599 Stuttgart
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e-Mail: info@alko-cert.de

Geschäftsführerin Dr. Annette Skipiol
Handelsregister Stuttgart HRB 740 358
USt-IdNr.: DE231046566
Bankverbindung:
Landesbank BW (BLZ 600 501 01) Konto 26 94 524
IBAN: DE 43 6005 0101 0002 6945 24 BIC: SOLADEST600

3. Successfully completed annual surveillance audit of ISO 14001:2004 EMS Certification. The audit is conducted by independent auditor of the certifying company (The report suggested for more advance improvements thru 7 ways).

AUDIT SUMMARY ISO 14001:2004 EMS (2015)

Audit Report


Precisely Right.

Client	Standard(s)	Certification Number(s)	Audit Type
Oriental Press	DIN EN ISO 14001:2004	CN 01 104 106848	Follow Up 1 Audit

5. Positive findings and opportunities for improvement

No.	Unit/Department Site	Positive findings
1	Management	Commitment from top management and all employees towards implemented environmental management system
2	Management	Effective Closure of Previous audit NCR
3	Management	Commitment towards energy conservation
4	Management	Compliance towards FSC & PEFC found good

The following recommendations and opportunities for improvement provided by the auditors are intended to contribute to the continuous improvement of the management system. They also serve to eliminate any weaknesses still existing in the organization, ensure management system effectiveness and prevent nonconformities.

No.	Unit/Department Site	Recommendations and opportunities for improvement
1	Management	Existing Controls for various Aspect/impacts captured in the planning register need to be improved
2	Planning	Planning register to include all the missed out activities. Ex. Maintenance Activities of Compressor
3	Management	Communication towards implementation of management programs to be made more effective
4	Management/ Human resource	Induction training of Subcontracted labourers to include topics related to EMS requirement. Ex. Waste Segregation
5	Management	Internal audit to include all the clauses of the standard Ex. 4.4.2
6	Management	Actions/decisions discussed during MRM to be Monitored more effectively
7	Management	Mock drill to be conducted for all identified possible emergencies in the organisation. Ex. Environmental emergency

6 Dates

Due Date for the next audit 12.06.2016

Agreed date for the next audit 13.04.2016

27.05.2015

Date



Mahendiran CR

Audit Leader / Auditor(s)/Expert

Annex ISO 14001

• Rev. 3.2 (2010-10) Page 5/7

AUDIT SUMMARY ISO 14001:2004 EMS (2014)

Audit Report

TÜVRheinland®
Precisely Right.

Client	Standard(s)	Certification Number(s)	Audit Type
Oriental Press	ISO 14001:2004 + Cor. 1:2009	01 104 106848	Recertification

5 Positive findings and opportunities for improvement

No.	Unit/Department Site	Positive findings
1	Management	Strong commitment from top management and all employees towards implemented management system
2	MR	Effective closure of previous audit NCR
3	Management	Commitment towards energy conservation
4	Management	Compliance towards FSC & PEFC found good

The following recommendations and opportunities for improvement provided by the auditors are intended to contribute to the continuous improvement of the management system. They also serve to eliminate any weaknesses still existing in the organization, ensure management system effectiveness and prevent nonconformities.

No.	Unit/Department Site	Recommendations and opportunities for improvement
1	Objectives & Targets	Objectives are to be defined beyond requirements & compliance
2	HR & Training	Competency defining with respect to significant environmental aspects needs improvement
3	Haz Waste Management	Storage of Hazardous & Non-hazardous waste needs improvement
4	Environmental Incidents	Mechanism of registering Environmental Non conformance to be strengthened.
5	Legal	Legal compliance register to be reviewed to capture Other requirements compliance
6	Emergency Preparedness	Mock drill to be conducted for all identified potential emergency scenario and to bench mark the timings
7	Internal Audit	MR function to be covered in Internal Audits & the reports to address relevant standard clauses. Clause addressing and CAPA on NCs raised to be improved
8	MRM	Agenda points like Status on CAPA & previous MRM open points are to be discussed in detail

The auditor confirms his check that there is no conflict of interest, especially that neither he, nor his employer, the organizational unit to which he belongs or an associated partner in the private sphere has provided consulting services - including in-house training and internal audits - to the client on the implementation, development and maintenance of a management system within the last two years.

Rev. 3.2 (2010-10) Page 5/6

4. Paper waste controlled effectively as a result there is no increase in waste during 2015
5. Aluminum sheets wastage controlled effectively as a result no increase of waste during 2015. Used sheets sold 100% to Recycling Company.

6. Developed online system of plotter which reduced paper consumption for proof, cartridge consumption, and electricity saving by 95% in its related section (till 2014 this was 80%). This online system has helped us to reduce courier cost and natural resources (fuel), ultimately it reduces emission of gases, less paper consumption.
7. Disposed all used chemical inline with guidance provided by Government of Dubai Municipality.
8. From Year – 2015 we have started to provide all used/waste chemical to recycling Company M/S Gulf Environment & Waste FZE, Dubai
9. Electricity consumption decreased by 2% during 2015 as compare to 2014 (based on production impressions).
10. Installed LED tube rods in the office block and inside factory's manufacturing area which provides annual saving of 263000 electricity units. The Project is ready and working from July – 2015. This Project is complying top management's view towards green environment.

COP: ANTI-CORRUPTION

PRINCIPLES

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Policy/Commitment

Oriental Press will not condone any violation of the law, dishonesty or unethical business dealing by any employee, including any payment for, or other participation in, any illegal act such as bribery, fraud, theft, money-laundering or illicit dealing of any kind.

System of implementation:

Oriental Press has a principle of ethical commercial practices since its inception in 1952. It has been part of our company values to fight corruption within our business practices.

1. Annual Financial Audit
2. The handbook of Oriental Press
3. Anti-Bribery Policy (refer to page#16)
4. Internal Audit Department

Activities:

1. Conducting annual financial audit
2. Conducting Internal audit

Results:

1. Financial Auditor and Internal Auditor did not observe any incident of bribery/corruption.
2. There is no any legal notice by law enforcement agency relating to anti-corruption.
3. Oriental Press is committed to increase business with customers who are also fighting for developing culture of anti-bribery. Our two major customers Oxford University Press (OUP) and Cambridge University Press (CUP) have their own written policy for Anti-Corruption. We are in process to encourage our other suppliers to have their written policy for Anti-Corruption.

Anti-Bribery Policy of Oriental Press “Oriental Printing Group”

(a) Introduction

OPG values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the firm's staff as well as others acting on the firm's behalf are both key to maintaining these standards.

The purpose of this document is to set out the firm's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with OPG or its subsidiary companies, within all regions, areas and functions.

(b) Policy statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

(c) Scope

Who is covered by the policy?

In this policy, **third party** means any individual or organization and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy covers:

- Bribes
- Gifts and hospitality
- Charitable contributions

(d) Bribes

Employees must not engage in any form of bribery, either directly or indirectly.

(e) Gifts and hospitality

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

Within these parameters, local management may define specific guidelines and policies to reflect local professional and industry standards.

(f) Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether for in-kind services, knowledge, time or direct financial contributions. However, employees must be careful to ensure that charitable donations are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Managing Director.

All charitable contributions should be publicly disclosed.

ETHICAL TRADE INITIATIVES (SEDEX Standards)

THE ETI BASE CODE

1. Employment is freely chosen

- 1.1 There is no forced, bonded or involuntary prison labor.
- 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.

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 organizational 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.

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 minimizing, 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 programs 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; "child" and "child labour" being defined in the appendices.

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 practiced

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.

8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognized 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.