

ORIENTAL PRESS

(ORIENTAL PRINTING GROUP)

COMMUNICATION ON PROGRESS (COP)

2021 (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	6
7	COP: ENVIRONMENT	9
8	COP: ANTICORRUPTION	15
9	ANTI-BRIBERY POLICY	16
10	SEDEX STANDARDS (ETI Base Code)	18
11	ICTI ETHICAL TOY PROGRAM COVERED AREAS	21

The Ten Principles of the UN Global Compact

Corporate sustainability starts with a company's value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. Responsible businesses enact the same values and principles wherever they have a presence, and know that good practices in one area do not offset harm in another. By incorporating the Ten Principles of the UN Global Compact into strategies, policies and procedures, and establishing a culture of integrity, companies are not only upholding their basic responsibilities to people and planet, but also setting the stage for long-term success.

The Ten Principles

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

1. The Universal Declaration of Human Rights
2. The International Labor 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.

Labor

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 labor;

Principle 5: the effective abolition of child labor; 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, 2021 (last report submitted in June 2021 covered progress of JAN-DEC 2020).

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

Oriental Printing Group (OPG) was established in 1952 and then re registered in 1982. Our head office is in Bahrain where we have 2 plant specializing 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 focused on book production. In Dubai we are facilitated to produce hard back, with printed case or imitation cloth, jacket, paperback, flexi-bound and wire-o-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 45001:2018 H & S, ISO 9001:2015 QMS & ISO 14001:2015 EMS.

We are also able to readily source and supply environmentally recognized 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 45001:2018 H & S, ISO 9001:2015 QMS & ISO 14001:2015 EMS and FSC & PEFC.

Oriental Press Dubai started independent carbon footprint assessment, 1st assessment performed for Y-2021 by Climate Partner. Now onward annual assessment will be assured to introduce plans for carbon footprint reductions.

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. In the end of Year-2015 Oriental Press removed classical halogen type tube rods and installed LED tube rods in factory area for lighting requirement that is resulting in saved energy consumption (saving around 260000KWh electrical units per year) as well as helpful in saving footprints, natural resources.

Further to above, Since Y-2016 we introduced water recycling system with CTP machine that resulted in reduction of water consumption by more than 50% for plate processing. Additionally, Oriental Press is affiliated with SEDEX (International Organization working towards Health & Safety, human rights of labor, ethical business practices). 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.

Additionally, Oriental Press engaged authorized representative of Climate Partner for computing Carbon Footprint Assessment Y-2021. Based on report, carbon footprint assessment and reduction plan will be prepared and implemented gradually.

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. Registered with ICTI Ethical Toy Program that covers Labor and Social standards. Now onward there will be annual surprise audit by independed audit firms authorized by ICTI Ethical Toy Program
4. 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 group of staffs from different 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).
10. Conducting annual fire drill/mock drill to ensure all staff aware to overcome fire emergency situation
11. All accommodation and factory areas are equipped with a first aid kits, fire extinguisher, smoke detector, emergency torch light and whistle etc.
12. Our staff is covered for group medical as well as workmen compensation insurance to overcome any health and safety risks.
13. 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. Completed registration process with ICTI Ethical Topy Program and awaiting for Initial Certification audit by third party auditor.

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 have completed registration process of ICTI certification that is covering social and labor standards.

Oriental Press now certified for ISO 45001:2018 and committed to ensure continues compliance of the requirements.

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 ICTI Certification
3. Health & Safety requirements of ISO 45001:2018 H & S
4. Internal Audit Department
5. 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 written 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. Written grievance handling mechanism available and communicated to staff
4. Each staff has easy and direct access to top management regarding any issue.
5. Continuous observations by internal Auditor
6. Annually independent audit for ISO 45001:2018 H & S

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 labor 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 various different countries of the world including India, Pakistan, Bangladesh, Srilanka, Philippine, Syria, Egypt, UK, Bahrain, Nepal, Mauritania, and Nepal, 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:
 - 30% 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. 1st Certification Assessment audit for ISO 45001:2018 Health & safety was conducted on Aug 11, 2021 and successfully received certification. Below is the certificate copy as reference:



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 14001:2015 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)
4. Carbon Footprint Assessment annually

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.
8. CTP Plate processing machine installed with water recycling system, it results in reducing water consumption by more than 50% for each plate process

Results:

1. Annual FSC and PEFC audit conducted by independent auditors of SCS Global Services during Aug-2021. Successfully cleared FSC audit with 1 NC while PEFC with zero NC.

Please refer to next page for copy of FSC & PEFC audit reports conducted during Y-2021

Refer next page for report summary

FSC Audit conducted Y-2021 & successfully renewed FSC Certificate

CORRECTIVE ACTION REQUESTS (CARs) – CERTIFICATION DECISION				
Select Standard Assessed	Normative Documents (including related advice notes and interpretations)	# Major CAR(s)	# Minor CAR(s)	# Observation(s)
<input checked="" type="checkbox"/>	FSC-STD-40-004 V3-0 - Chain-of-Custody	1	1	1
<input checked="" type="checkbox"/>	FSC-STD-50-001 V2-0 - Trademark Usage	0	0	0
<input type="checkbox"/>	FSC-STD-40-005 V3-1 - Controlled Wood			
<input type="checkbox"/>	FSC-STD-40-007 V2-0 - Reclaimed Material			
<input type="checkbox"/>	FSC-STD-40-003 V2-1 - Multiple Sites			

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7

<input checked="" type="checkbox"/>	PEFC ST 2002:2013 Second Edition - Chain-of-Custody	0	0	0
<input checked="" type="checkbox"/>	PEFC ST 2001:2008 Second Edition - Trademark Usage	0	0	0
<input type="checkbox"/>	SFI 2015-2019 Section 4 - Chain-of-Custody			
<input type="checkbox"/>	SFI 2015-2019, Section 5 - Trademark Usage			
<input type="checkbox"/>	SFI 2015-2019, Section 3, Appendix 1 - Certified Sourcing			
AUDITOR CERTIFICATION RECOMMENDATION		The organization was evaluated against FSC standards FSC-STD-40-004 V3-0, FSC-STD-50-001 V2-0, PEFC CoC Standard PEFC_ST_2002-2013 and PEFC Logo Standard PEFC_ST_2001-2008_v2 in its FSC 3 rd Surveillance and PEFC 2 nd surveillance audit on 18 th Aug 2021. The organization was found to be complying with the requirements of the standards except 1 Major, 1 Minor CARs and 1 Observation. The organization is recommended to continue the FSC and PEFC certificate.		

- Certification audit for ISO 14001 2015 EMS conducted in Aug 2021 and successfully issued certificate valid till Sep 2024

Refer to next page for report:



2021/103236/RC1
ISO 14001:2015

5.0 Concerns Raised

Non-Compliance (NC)= major break-down in a process that may directly effect the final product or service being delivered, regulatory failure; or danger to life, or lack of compliance to a clause of the standard. Discrepancy (D) = a partial break-down in a process that does not directly cause a failure to the Product or Service being delivered, partial regulatory failure; possible minor injury, or partial non-compliance to a clause or sub-clause of the standard.

Number	Wording of Requirement	Wording of NC or D (Include Client Document Reference)	Evidence for NC or D	Clause Ref.	Classification	Justification of D
1	The organization shall establish, implement and maintain the process(es) needed to evaluate fulfillment of its compliance obligations. The organization shall: a) determine the frequency that compliance will be evaluated; b) evaluate compliance and take action if needed;	The organization failed to conduct air quality Monitoring FY 2021	Air quality and Noise Monitoring not conducted FY 2021	9.1.2	D	Air quality Monitoring was delayed due to COVID -19

HeadOffice-D1-RH-BL2DBL
10.4

Assuring
Confidence

3. Performed Carbon Footprint Assessment for the Y2021 by independent consultant Climate Partner/FARNEK. Below is the summary outcome for Scope-1 Scope-2 & Scope-3

CCF Results Table: Corporate Carbon Footprint 2021

Total result for the period 01/2021 - 12/2021.

Emission sources	t CO ₂	%
Scope 1	1,000.38	5.3
Direct emissions from company facilities	935.45	5.0
Refrigerant leakage	935.45	5.0
Direct emissions from company vehicles	64.93	0.3
Vehicle fleet	64.93	0.3
Scope 2	2,306.10	12.2
Purchased electricity for own use ³	2,306.10	12.2
Electricity (stationary)	2,306.10	12.2
Electricity (vehicle fleet)	0.00	0.0
Scope 3	15,557.73	82.5
Purchased goods and services	12,235.85	64.9
Substrates	9,783.60	51.9
Auxiliary and operating materials	1,744.58	9.2
Packaging materials	678.25	3.6
Gastronomy	27.12	0.1
Electronic devices	1.60	0.0
Water	0.70	0.0
Fuel- and energy-related activities	1,465.90	7.8
Upstream emissions electricity	1,425.48	7.6
Upstream emissions vehicle fleet	40.42	0.2
Upstream transportation and distribution	1,043.44	5.5
Inbound logistics	1,043.44	5.5
Downstream transportation and distribution	603.61	3.2
Outbound logistics	603.61	3.2
Waste generated in operations	94.43	0.5
Operational waste	94.43	0.5
Employee commuting	59.31	0.3
Employee Commuting	59.31	0.3
End of life treatment of sold products	54.63	0.3
Product disposal	54.63	0.3
Business travel	0.56	0.0
Rental and private vehicles	0.56	0.0
Overall results	18,864.21	100.0

4. Paper waste decreased during Y-2021 as compare to production rate of Y-2020. We are fully committed to control paper waste and always planning to buy economical size to avoid size of side cutting wastage.
5. Selling all waste paper and used aluminum printing plates to recycling companies only. Continuously working to reduce waste paper and plates rejection.
6. No more hard proof for customers review, only online proof are shared with clients for approval to start production of printing/books preparation (only if some customers demand, we print hard print proof)..
7. Disposed all used chemical inline with guidance provided by Government of Dubai Municipality.
8. Since Y-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 8% during 2021 as compare to 2020 (printing impressions increased by 24% while electricity only by 16%). Management continuously striving to reduce further electricity consumption with reference to produced number of impression, our team always working to find innovative ideas to control electricity resources and reduce wastes.
10. Since July-2015 installed LED tube rods in the office block and inside factory's manufacturing area which provides annual saving of 263000 Kwh electricity units.
11. This Project is complying top management's view towards sustainable environment.
12. Since Y-2018 installed Water recycling unit at CTP machine that has reduced water consumption by more than 50%. Earlier each printing plate CTP process requires 15+Ltr per plate but only now only 5+Ltrs.
13. During 2021 water consumption increased by 6% while plates production decreased 4%. Our team investigating real cause of such drastic trend of water's increased consumption. However, we have installed sensors for water tap and working on its study, if it works better, we may introduce same for all water tap locations.

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
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.

WHAT DOES THE ICTI ETHICAL TOY PROGRAM COVER?

Audit Process

Factories are transparent, auditors given full access to premises; able to conduct worker interviews without interference

Business Ethics

No attempts to improperly influence the process or the outcome of audits

Discrimination

No discrimination in recruitment, workplace or dismissal

Disciplinary Practices

Employees are treated with dignity and respect at all times

Employee Representation

Rights of freedom of association and collective bargaining are recognized and respected

Employment Practices

Compliance with applicable employment regulation and requirements, labor contracts provided to all workers

Environment and Chemical safety

Compliance with environmental regulations, training to ensure chemicals are handled safely

Modern Day Slavery

No forced, involuntary or prison labor, no recruitment fees, all overtime is voluntary

Safety

Workplace conditions are safe, employee health is safeguarded, protective equipment provided and utilized, effective emergency procedures

Underage Labor

No child labor, enhanced protections for young workers

Wages

Legal, fair, and accurate pay received without delay

Working Hours

Hours are not excessive, adequate rest breaks provided