



ETHICAL POLICY

INTRODUCTION

This Ethical Policy serves as a guideline for all Impamark's business practices. Through its business practices Impamark seeks to support the principles of the Universal Declaration of Human Rights (UDHR). Impamark's position on Human Rights reflects the core requirements of the UDHR, such as freedom from torture, unjustified imprisonment, unfair trial and other oppression. It also includes freedom of expression, religion and political or other representation. Impamark is also committed to eliminating bribery and corruption.

1. EMPLOYMENT OF APPROPRIATE WORKERS

On the basis of this policy Impamark will only work with suppliers who ensure there is

1.1 no forced, bonded, or involuntary prison labour used in the production of goods. Workers must not be required to lodge deposits or identity papers as a condition of work and must be free to leave their employer upon reasonable notice.

1.2 no child or under age labour. All workers must have reached the minimum legal working age under national law.

1.3 agreement in the principles of remediation programmes enabling children and under age workers to return to quality education, even if children and under age workers do not form part of Supplier's work force.

1.4 no workers under the age of 18 working at night or under potentially hazardous conditions. Suppliers must have in place worker management systems for young workers.

2. HOURS, PAY & BENEFITS

On the basis of this policy Impamark will only work with suppliers where:

2.1 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.

2.2 all workers are 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.

2.3 deductions from wages as a disciplinary measure are not permitted or any deductions from wages not provided for by national law without the expressed permission of the worker concerned. All

disciplinary measures should be recorded.

2.4 working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

2.5 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.

3. HUMAN RIGHTS

On the basis of this policy Impamark will not provide support or work with:

3.1 businesses or organisations which fail to uphold basic human rights within their sphere of influence. Impamark recognises that businesses have the opportunity to ensure that human rights are upheld in all those aspects of their operations that they could reasonably expect to control. These can include:

- direct control, such as labour conditions within their factories, for example, or use of land for their operations;
- more indirect influence, for example, companies occupying positions of strategic importance within a country often have opportunities to affect positive social change beyond their own operations.

3.2 businesses or organisations with links to an oppressive regime - regimes where basic human rights, as set out in the UDHR, are denied in a systematic manner over time. By “links to an oppressive regime” Impamark means:

- businesses operating in states governed by oppressive regimes, whose activities are considered to support or benefit the regime, usually at the expense of the indigenous population;
- businesses using state security forces or supplying arms to state security forces within an oppressive regime.

4. ARMS TRADE

4.1 Impamark will not provide support or work with businesses or organisations involved in the manufacture or transfer of armaments to oppressive regimes, including:

- companies which manufacture for or sell to oppressive regimes systems (or products) that kill, maim or destroy;
- companies who issue licences for the production of armaments for oppressive regimes;
- individuals or organisations involved in the brokerage of armaments to oppressive regimes;
- companies which export products to oppressive regimes that, while not designed to kill, maim or destroy, are parts for equipment which have a battlefield application or are essential to the operation of a weapon, such as radar and electronic warfare, military communications and armour.

5. GLOBAL TRADE

Impamark advocates and supports the Fundamental International Labour Organisation Conventions. These Conventions are the most widely-accepted standards for minimum labour rights and cover the use of forced labour, use of child labour, collective bargaining and freedom of association. Impamark will seek to support businesses or organisations that take a responsible position with regard to:

- fair trade
- labour rights in their own operations and through their supply chains in developing countries

Impamark will not support businesses or organisations whose activities include:

- irresponsible marketing practices in developing countries, including inappropriate marketing to children;
- inappropriate financial trading methods;
- tobacco product manufacture or distribution

6. GENETIC MODIFICATION

Impamark will not provide support or work with businesses or organisations involved in the development, distribution or marketing of genetically modified organisms (GMOs) where, in particular, the following activities are evident:

- uncontrolled release of GMOs into the environment
- any negative impacts on developing countries such as the imposition of “Terminator” technologies - technologies that genetically engineer sterility into crop plants, for no other purpose than to protect and enforce corporate patents on GM seeds

7. ECOLOGICAL IMPACT AND ANIMAL WELFARE

Impamark actively seeks ways to reduce the ecological impact of its own activities in terms of energy and materials usage. Impamark will encourage the organisations it works with to take a pro-active stance on the environmental impact of their own activities to avoid repeated damage to the environment and will actively support organisations involved in:

- recycling and sustainable waste management
- renewable energy and energy efficiency
- sustainable natural products and services including timber and organic produce
- the pursuit of ecological sustainability
- the development of alternatives to animal experimentation
- farming methods which promote animal welfare

8. CONFIDENTIALITY

Information received by employees, contractors or agents of Impamark will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given. Impamark will at

all times ensure that it complies with all applicable requirements of data protection legislation in force from time to time.

9. BRIBERY AND CORRUPTION

Impamark is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010. Impamark will:
carry on business fairly, honestly and openly

- not make bribes so as to gain a business advantage nor condone the offering of bribes on Impamark's behalf
- not accept bribes to influence business nor agree to bribes being accepted on Impamark's behalf
- avoid doing business with others who do not accept Impamark's values and who may harm Impamark's reputation; and
- as far as possible ensure that all company staff and business partners are aware of Impamark's bribery policy

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