



24/01/2020

RE: Code of Conduct Policy

Dear Supplier/Customer,

As part of our on-going business improvement plan, we have chosen to follow the United Nations' Global Compact and its Ten Principles. We have elected to implement and follow this initiative to ensure IFL continues to conduct its business in an ethical manner and protect the welfare of its employees.

The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. By doing so, business, as a primary driver of globalization, can help ensure that markets, commerce, technology and finance advance in ways that benefit economies and societies everywhere. For further information on this subject, please visit the UN Global Compact website: www.unglobalcompact.org.

Please find a copy of our business Code of Conduct attached. We would like this small step forward to have a positive effect on our global supply chain and encourage you to look further into the Ten Principles and, if you don't have something in place already, integrate a similar policy into your business. We really believe if every business made this small promise, together we can have an enormous global impact for the future.

If you want to speak to me more regarding the UN Global Compact or our Code of Conduct policy, please call me on the number below.

Yours Sincerely,

Mr Ian Simpson
Managing Director, International Fasteners Ltd



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International Fasteners Ltd Code of Conduct Policy - Issue 1: 16/09/2014



Employment and the Workplace

Equal Employment Opportunity/Non-discrimination: We believe that all terms and conditions of employment should be based on an individual's ability to do the job and not on the basis of personal characteristics or beliefs. We provide employees with a working environment free of discrimination, harassment, intimidation or coercion relating directly or indirectly to race, religion, sexual orientation, political opinion or disability.

Forced Labour: We do not use any prison, slave, indentured, or forced labour in the manufacture/processing of any of our products.

Child Labour: We do not utilize child labour in the production of any product. We do not employ any person under the age of 16, or the age at which compulsory schooling has ended, whichever is greater.

Hours of Labour: We maintain reasonable employee work hours based on the limits on regular and overtime hours allowed by local law. Overtime, when necessary, is fully compensated at a rate above the regular hourly rate. Employees are permitted reasonable days off and leave privileges.

Coercion and Harassment: We acknowledge the value of our staff and treat each employee with dignity and respect. We do not use cruel and unusual disciplinary practices such as threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse.

Compensation: We fairly compensate our employees by complying with all applicable laws, including minimum wage laws.

Health and Safety: We maintain a safe, clean and healthy environment in compliance with all applicable laws and regulations. We provide adequate medical facilities; clean restrooms; unrestricted access to drinkable water; well-lit and ventilated workstations; and protection from hazardous materials or conditions.

Concern for the Environment

We believe it is our duty to protect the environment and we do this by complying with all applicable environmental laws and regulations. We are ISO14001 accredited and will continue to surpass the objectives prescribed within our Environmental Policy.

Ethical Business Practices

Sensitive Transactions: It is our policy to prohibit employees from entering into sensitive transactions - business dealings generally considered to be either illegal, immoral, unethical or to reflect adversely on the integrity of the Company. These transactions usually come in the form of bribes, kickbacks, gifts of significant value or payoffs made to favourably influence some decision affecting a company's business or for personal gain of an individual.

Commercial Bribery: We prohibit employees from receiving, directly or indirectly, anything of value in return for using or agreeing to use his or her position for the benefit of that other person. Similarly, commercial bribes, kickbacks, gratuities and other payoffs and benefits paid to any customer are prohibited. However, this does not include expenditures of reasonable amount for meals and entertainment of customers if they are otherwise lawful, and should be included on expense reports and approved under standard Company procedures.

Accounting Controls, Procedures and Records: We accurately keep books and records of all transactions and the dispositions of our assets as required by law, as well as maintain a system of internal accounting controls to ensure the reliability and adequacy of our books and records. We ensure only transactions with proper management approval are accounted for in our books and records.

Use and Disclosure of Inside Information: We strictly prohibit disclosure of material inside information to persons within the company whose positions deny access to such information. Inside information is any data that has not been publicly disclosed.

Confidential or Proprietary Information: We take extra care to keep our customers' trust and confidence in us. Thus, we prohibit employees from disclosing confidential or proprietary information outside the Company that could be harmful to our clients, or to the Company itself. Such information may only be shared with other employees on a need-to-know basis.

Conflicts of Interest: We designed our policy to eliminate conflicts between the interests of employees and the Company. Since it is difficult to define what constitutes a conflict of interest, employees should be sensitive to situations which could raise questions of potential or apparent conflicts between personal interests and the Company's interests. Personal use of Company property or obtaining Company services for personal benefit may constitute a conflict of interest.

Fraud and Similar Irregularities: We strictly prohibit any fraudulent activity that might injure our customers and suppliers, as well as the Company. We follow certain procedures concerning the recognition, reporting and investigation of any such activity.

Inspection and Documentation

We have designated one of our employees to inspect and certify that the Code of Conduct is being observed. Records of this certification shall be accessible to our employees, agents, or third parties upon request.