

Ethics policy



last updated: January 2014

This ethical sourcing policy applies to all materials and services sourced by or on behalf of INSIGHT AU PTY Ltd (ABN 67 114 815 557) (referred to in this policy as "Insight", "our", "we" or "us"). Please read it carefully.

At Insight we aim to provide our customers with quality services and products in a manner that reflects our philosophy on human rights, fairness, co-operation, integrity and non-discrimination of any kind.

In the course of our daily activity we contract services from suppliers locally and also internationally either directly or via other third party suppliers (our supply chain).

It is the policy of Insight that in all cases, our supply chain will conform to the same ethical standards as we hold for ourselves, to ensure that we are;

1. sourcing products and services in a responsible manner,
2. working with suppliers who share our philosophy and who have clearly established social and environmental practices,
3. providing clear guidance to our suppliers in terms of the manner in which we expect them to behave,
4. protecting our corporate reputation, and the reputation of our brand,
5. protecting our clients' reputation, as far as possible.

Our Commitment

Insight is committed to upholding human rights, fair working conditions and environmental protection. In accordance with the expectations of our customers, the community, and the requirements of the Law, we endeavour to always operate responsibly within the community and we expect the same from our suppliers. Maintaining a reputation for the highest legal, moral and ethical standards in our dealings with our customers, suppliers and other key stakeholders is critical for our ongoing success. This Policy has therefore been developed to compliment our core values of integrity, trust and acting responsibly.

Expectations

We expect our suppliers to support the ethical standards set out in this Policy with regard to workplace safety, environment, and fair pay and employment conditions. The Policy sets out the standards that we expect all of our suppliers to comply with when producing and

supplying products for Insight, no matter where they operate in the world. Our suppliers must commit to complying with the following requirements, which represent minimum standards based on the principles of the United Nations Universal Declaration of Human Rights.

1. COMPLIANCE WITH LAWS AND REGULATIONS

The Company requires its suppliers, employees, officers and directors to comply with all applicable laws and regulations in countries where the Company does business. These parties shall not engage in acts of bribery and corruption and shall not falsify documents and record.

Violation of domestic or foreign laws and regulations may subject an individual, as well as the Company, to civil and/or criminal penalties. Employees have an obligation to comply with all laws and regulations and policies and procedures and to promptly alert management of any deviation from them.

2. FAIR DEALING

Each employee, officer and director should endeavour to deal fairly with the Company's suppliers, competitors and employees. No one should take unfair advantage of another through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Information about the Company's competitors must be used in an ethical manner and in compliance with the law. Under no circumstance should information be obtained through theft, illegal entry, blackmail, or electronic eavesdropping, or through employees misrepresenting their affiliation with the Company or their identity. Any proprietary or non-public information about the Company's competitors should not be used if it is suspected that such information has been obtained improperly.

3. CONFLICTS OF INTEREST

The Company expects all employees, officers and directors to exercise good judgment and the highest ethical standards in private activities outside the Company that in any way can affect the Company. They shall at all times exercise particular care that no detriment to the interest of the Company may result from a conflict between those interests and any personal or business interests which the individual may have. In particular, every employee, officer and director has an obligation to avoid any activity, agreement, business investment or interest or other situation that might, in fact or in appearance, cause an individual to place his or her own interest, or that of any other person or entity, above his or her obligation to the Company. The words "in appearance" should be noted particularly since the appearance of an action might tend to impair confidence even if the individual may not actually do anything wrong.

4. CONFIDENTIALITY

All employees, officers and directors are responsible for safeguarding and keeping confidential any information that the Company considers to be of a confidential or sensitive nature. Such information includes, but is not limited to financial records and reports, marketing and strategic planning information, employee-related documents, unpublished manuscripts as well as information relating to potential mergers and acquisitions, stock splits and divestitures, and other materials that the Company would not want disclosed to a competitor or any unauthorized recipient, or that might be harmful to the Company or its customers if disclosed whether or not such information is marked "confidential."

5. ENVIRONMENT COMPLIANCE

The facility shall comply with national and local environmental laws and regulations. The facility shall dispose of its production waste in accordance with local environmental laws and regulations. The facility must have identified and documented its key environmental impacts and implemented controls to minimise its impact on the environment with respect to solid waste disposal, hazardous chemicals storage and management, air and water emissions.

6. LABOUR RIGHTS

Employment is freely chosen, with no forced, bonded or involuntary prison labour. Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

7. REGULAR EMPLOYMENT

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

8. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace. 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.

9. WORKING CONDITIONS

A safe and hygienic working environment is 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 in the working environment. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

Access to clean toilet facilities and to clean and drinkable water and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

Suppliers will ensure that personal protective equipment is available and workers are trained in its use. Safeguards on machinery must meet or exceed local laws. Suppliers shall assign responsibility for health and safety to a senior management representative.

10. WORKING HOURS

Working hours comply with any Law and benchmark industry standards, whichever affords greater protection. 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 be excessive, shall not be demanded on a regular basis and shall always be compensated at a premium rate

11. SUB-CONTRACTING AND HOME WORKING

All suppliers must have adequate processes in place for properly managing sub-contracting and home working to ensure sub-contractors do not abuse, exploit or provide unsafe working conditions for their employees

12. LIVING WAGES

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.

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. Deductions from wages as a disciplinary measure or any deductions from wages not provided for by Law shall not occur without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

13. DISCRIMINATION

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.

14. EMPLOYMENT OF RELATIVES

The Company's policy is to require advance approval before a relative of an employee is hired by the Company, or is engaged as a consultant or independent contractor of the Company, if the relative of the employee will be in the same department or chain of command of the Insight employee. Such approval should be sought from the requisite member of the Insight Management Team. A "relative" may include a member of the employee's family (spouse, child, parent, sibling, in-law) but may also include, for purposes of this Policy, any individual who is living with or otherwise in a significant relationship with the employee, or a relative of such an individual.

15. ENTITLEMENT TO WORK AND IMMIGRATION

Only workers with a legal right to work shall be employed or used by the supplier. All workers, including employment agency staff must be validated by the supplier for their legal right to work by reviewing original documentation. The supplier shall implement processes to enable adequate control over agencies with regards to the above points and related legislation.

16. CHILD LABOUR

Insight supports International Labour Office Convention 138 with regard to the

appropriate age of workers and will not work with suppliers who use child labour.

Child labour refers to work that: is mentally, physically, or morally harmful to children; can negatively affect their mental, physical, or social development, and interferes with their schooling; or by depriving them of the opportunity to attend school; or by obliging them to leave school prematurely; or by requiring them to attempt to combine school attendance with excessively long and heavy work. In short: child labour is work that deprives children of their childhood, their potential and their dignity, and is harmful to their physical and mental development.

17. HARSH OR INHUMANE TREATMENT

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

COMPLIANCE WITH THE POLICY

Insight AU Pty Limited expects its suppliers to comply with all aspects of this Policy, and is committed to working in partnership with its suppliers to help achieve compliance with this Policy.

In the event of any supplier being unwilling or unable to demonstrate continuous improvement towards full compliance with our standards, the trading agreement between Insight AU Pty Limited and the supplier will be terminated.

Each employee, officer and director is responsible for promptly reporting to the Company any circumstances that such person believes in good faith may constitute a violation of this policy. Except as provided in the next paragraph, suspected policy violations are to be reported (including confidential and anonymous reports) to a director of Insight (contacts below).

No retribution against any individual who reports violations of this Policy in good faith will be permitted. However, the reporting of a violation will not excuse the violation itself. The Company will investigate any matter that is reported and will take any appropriate corrective action.

KEY CONTACTS

If you have any questions about this Ethics Policy, please contact, Gerrard Malcolm

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