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ethics and employment policies

Ethics & Employment

ethical trade

Many workers worldwide are denied their fundamental rights at work and endure dangerous working conditions. They struggle to make ends meet on meagre, sometimes pitiful, wages and even suffer physical and psychological abuse. **At JBS, we believe this is unacceptable and as a result work very hard to ensure that the partners and suppliers conform to the highest standards/"best practice".**

This section allows a look into our work within this area and provides an introduction, including resources, to those who wish to develop their understanding of ethical trade issues.

What is Ethical Trade? - a basic introduction to supply chains, codes of practice, labour standards, and an FAQ and suggested reading list.

The JBS Base Code - what it is, and the full text of the Base Code and principles of Implementation, in various language.

introduction

"Ethical trade" means different things to different people. In particular, some people refer to "ethical trade" as an umbrella term for all types of business practices that promote more socially and/or environmentally responsible trade. Others use the term in a much narrower sense, referring specifically to the labour practices in a company's supply chain.

For JBS, and throughout this document, we use the term "ethical trade" in the narrower sense. For us, ethical trade – or ethical sourcing – means the assumption of responsibility by a company for the labour and human rights practices within its supply chain.

Why is it an issue?

Ethical trade became a growing issue during the 1990s because companies with global supply chains – in particular those in the clothing and food sectors – were coming under increasing pressure to ensure decent working conditions for the people who produce the goods they sell. A number of NGO and trade union campaigns raised consumers' awareness of poor working conditions in factories and farms in developing countries – factories and farms that produced goods for leading companies in Europe and North America.

As a result, a growing number of companies have decided that they can no longer turn a blind eye, and have adopted

some form of ethical sourcing policy to address growing public concern over supply chain labour issues. Pressure on companies has been maintained as NGOs and trade union organisations, both large and small, and both in developing as well as developed countries, have continued to campaign on these issues. Moreover, corporate investment companies are increasingly screening their investments according to a range of social and environmental criteria, including a company's efforts in addressing supply chain labour conditions. Together, these trends are making it more and more difficult for companies to ignore ethical sourcing issues.

What does it mean in practice?

Companies take responsibility for their supply chain labour conditions in many different ways. That is, there are many different approaches to ethical sourcing, and while some approaches are undoubtedly more effective than others, there is no one "right way".

Nevertheless, a company's ethical sourcing strategy usually involves adopting a "code of practice" that sets out minimum labour standards that they expect their suppliers to comply with.

What is a code of practice?

A code of practice – or code of conduct – is a set of standards or rules for ethical behaviour. *In the context of ethical trade, this refers to a code adopted by a company which sets out minimum labour standards that they expect their suppliers and sub-contractors to comply with.*

There are now hundreds of such codes in existence. These codes differ significantly in terms of what **labour standards** they contain, who is involved in developing and managing them, and how they are being monitored and implemented.

In particular, it is useful to distinguish between the following types of codes:

Company code

This refers to a code developed and adopted at the level of an individual company, with or without reference to an external set of standards. For example, many multinational garment companies now have their own company codes that include standards for supply chain labour practices. At present, there are no "laws" or universally accepted rules about what such company codes should contain, or how they should be implemented. In practice, therefore, they range from the partial and vague, to the detailed and comprehensive.

Industry code

This is a code developed by an industry, usually through an industry association, that refers specifically to companies within that particular industry. An example is the International Council of Toy Industries (ICTI) Code of Business Practice. As with company codes, there are no universally accepted standards governing the content or implementation of these codes.

Multi-stakeholder code

A multi-stakeholder code is one developed and approved by both corporate and "civil society" representatives. Typically, the "stakeholders" involved in such code initiatives are companies, trade union organisations, other workers' organisations, labour and human rights NGOs, relevant government departments, and/or academics. Such "multistakeholder" codes have evolved in response to the regulatory vacuum in which corporate codes have developed. Stakeholders, in particular trade union organisations and NGOs, have sought to address this vacuum by setting certain minimum requirements, both in terms of what labour standards they believe a corporate code should contain, and in terms of how such a code should be monitored and implemented.

what is ethical trade

Labour standards

At the core of any company's ethical sourcing policy is a set of labour standards – usually encapsulated in a code of practice – that they expect their suppliers to comply with. But the standards adopted vary from company to company, both in terms of the issues they cover, and in terms of how stringent the standard is for a particular issue.

Increasingly, however, those involved in ethical trade, including JBS, recognise International Labour Organisation (ILO) standards as an international benchmark for labour codes.

International Labour Organisation (ILO) and ILO Conventions

The International Labour Organisation (ILO) is the UN specialised agency which seeks the promotion of social justice and internationally recognised human and labour rights. Unlike other UN agencies, it has a tripartite structure, being governed by employers' and workers' representatives as well as national governments. It formulates international labour standards in the form of Conventions and Recommendations setting out minimum standards of basic labour rights.

ILO Conventions have the force of international law, and states that ratify them are required to incorporate the

principles into national law and to ensure the implementation of the law. In addition, all ILO member states, regardless of ratification, are obliged to respect, promote and realise the principles contained in the core ILO Conventions, which address freedom of association and the right to collective bargaining, forced labour, child labour, discrimination and equal remuneration.

The JBS Code, and increasingly many other codes, are based on the Core Conventions and other relevant ILO standards. A full list of ILO Conventions and Recommendations can be found at www.ilo.org

jbs group & ethical trade

Ethical trade is still a relatively new field, and as yet there is little universally accepted "best practice" in terms of how to develop, monitor and implement a code of practice.

Nevertheless, at JBS we believe that there are a number of basic principles or tenets that underpin any effective and credible approach to ethical sourcing. These include the following:

- JBS considers voluntary codes of labour practice as complementary and not an alternative to the proper enforcement of national and international labour laws, and believes that such codes should be implemented in ways that help, and not hinder, the application of law.
- JBS believes that codes of labour practice should be based on internationally agreed labour standards, and that the most relevant standards are those set out in the Conventions of the International Labour Organisation (ILO).
- JBS believes that the tripartite structure of the ILO, involving both employers' and workers' representatives as well as governments, together with the technical expertise of this organisation in all matters relating to the world of work, make the ILO the authoritative and legitimate source of international labour standards. The JBS Base Code is based on the principles underlying key ILO Conventions.
- However, JBS's experience also underlines the importance of involving local stakeholders – their perspectives, knowledge and concerns – in the implementation of the codes.
- JBS sees the adoption of a code as just a starting point. A true commitment to ethical sourcing also involves committing adequate resources, communicating the code throughout the sourcing company and the supply chain, ensuring that relevant staff have appropriate skills, monitoring your suppliers, helping suppliers

make improvements, reporting on what you find in your supply chain, and supporting the verification of these findings.

- JBS believes that companies committed to ethical sourcing must require their suppliers to meet agreed standards within a reasonable timeframe, and that performance in this regard should ultimately be a pre-condition for further business.
- However, JBS recognises that the observance of some provisions in the JBS Base Code may not be immediately realisable in all cases. Some suppliers may be unable to meet all the terms within a short time or, in some cases, they may be constrained by national law. Therefore, reasonable timeframes and the existence of any constraints not controllable by the supplier may be taken into account.
- Nevertheless, JBS believes that failures to observe certain standards require rapid corrective actions if the sourcing company is to continue any business relationship with the supplier concerned. These include the use of forced, bonded or involuntary prison labour, as well as physical abuse or discipline, and extreme forms of intimidation.

JBS also believes that code implementation – from the design of an ethical sourcing strategy and monitoring and verification procedures, to the agreement and implementation of corrective action plans – is strengthened by the involvement of stakeholders other than companies. Key stakeholders are those organisations who represent workers (trade union organisations), and other organisations who work to defend workers' rights and address workers' concerns (e.g. relevant NGOs), environmental performance, governance or community engagement.

JBS base code

Underpinning all our work is the **JBS Base Code**. The Base Code contains nine clauses which reflect the most relevant international standards with respect to labour practices (**ILO Conventions**). The Principles of Implementation set out general principles governing the implementation of the Base Code.

The Base Code and Principles of Implementation have two related functions:

1. They provide a basic philosophy or platform from which JBS identifies and develops good practice.
2. They provide a generic standard for company performance. We believe that the labour standards incorporated in the Base Code constitute a minimum requirement for any corporate code of labour practice.
3. The Base Code and Principles of Implementation are

available in the following languages:

Ethical Trading Initiative base code

1. EMPLOYMENT IS FREELY CHOSEN

- 1.1 There is no forced, bonded or involuntary prison labour.
- 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 organisational 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 minimising, 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 programmes 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 PRACTISED

- 7.1 There is no discrimination in hiring, compensation, access to training, promotion or termination 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 recognised 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.

The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

Additional Note regarding JBS Ethical Policy:

JBS only purchases products from **recognised manufacturers who fully comply with their obligations under European legislation (where applicable)** for social responsibility for their workforce.

As part of our responsible ethical trading policy, JBS management and Quality Control go out to visit the factories that manufacture bulk/make-up stock for us. We visit and inspect them (often with 3rd party Government inspectors) to ensure that working conditions are such that we can stand over them with confidence.

JBS as a company takes ethical corporate social responsibility very seriously, not just in daily operational transactions, but also in a more holistic manner. A specific example of this is that in 2006 JBS set up Educo – a charity to educate children out of poverty. Educo is an established charity, now registered in Ireland, UK and India.

(JBS has given 15% of profits to Educo since 2006, most recently giving €300,000 to Educo in 2009).

Furthermore, JBS covers the administration costs of Educo – so that 100% of donations to Educo go directly to funding education rather than organisational costs. www.educo.ie and www.educo.in is an established charity providing free schooling to rural poor and slum children, primarily in India. Educo runs half a dozen schools, some of which provide vocational training, in particular to adolescents who have been victimised and taken advantage of.

As such, JBS is acutely aware of the difficulties of social responsibility; equally, we are very much in tune with the ethos of helping and contributing to being responsible socially.

modern slavery act

Overview

The Modern Slavery Act was enacted on 26 March 2015. The act consolidates slavery and trafficking offenses and introduces tougher penalties and sentencing rules. It ensures that the main offences are subject to the toughest asset recovery regime under the Proceeds of Crime Act 2002, introduces bespoke slavery and trafficking compensation orders, and provides for the confiscation of vehicles, ships and aircraft used for the purposes of trafficking.

The act includes provisions to:

- Enable the Secretary of State to make regulations relating to the identification of and support for victims
- Make provision for independent child trafficking advocates
- Introduce a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators
- Close gaps in the law to enable law enforcement to stop boats where slaves are suspected of being held or trafficked
- Require businesses over a certain size and threshold to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chain.

JBS and Effective Ethical Procurement

External drivers

The following external drivers influence an organisation's choice to purchase abroad, or from a particular supplier:

- Economic – exchange rates, profit margin, duties, tariffs, insurance, the employment market and availability of resources. Sustainable innovation can lead to the creation of new market space for products and services
- Technological – the ability to communicate real-time information enables developing country suppliers to compete effectively
- Legislation – social, technical, environmental and economic/competition
- Social – social consciousness, e.g. avoidance of worker exploitation, influences consumer behaviour and political activity. Increased worker satisfaction can im-

prove productivity

- Environmental – use of energy, re-useable, non-toxic materials, reduction of waste and processes to improve profit margins, reduction of carbon in supply chains, etc.

JBS Group Response to Ethical Procurement

Due to the business risk of unethical procurement practices, JBS Group already has a Code of Conduct that set out minimum standards and parameters for procurement other than simply cost.

They include the following ways of working which:

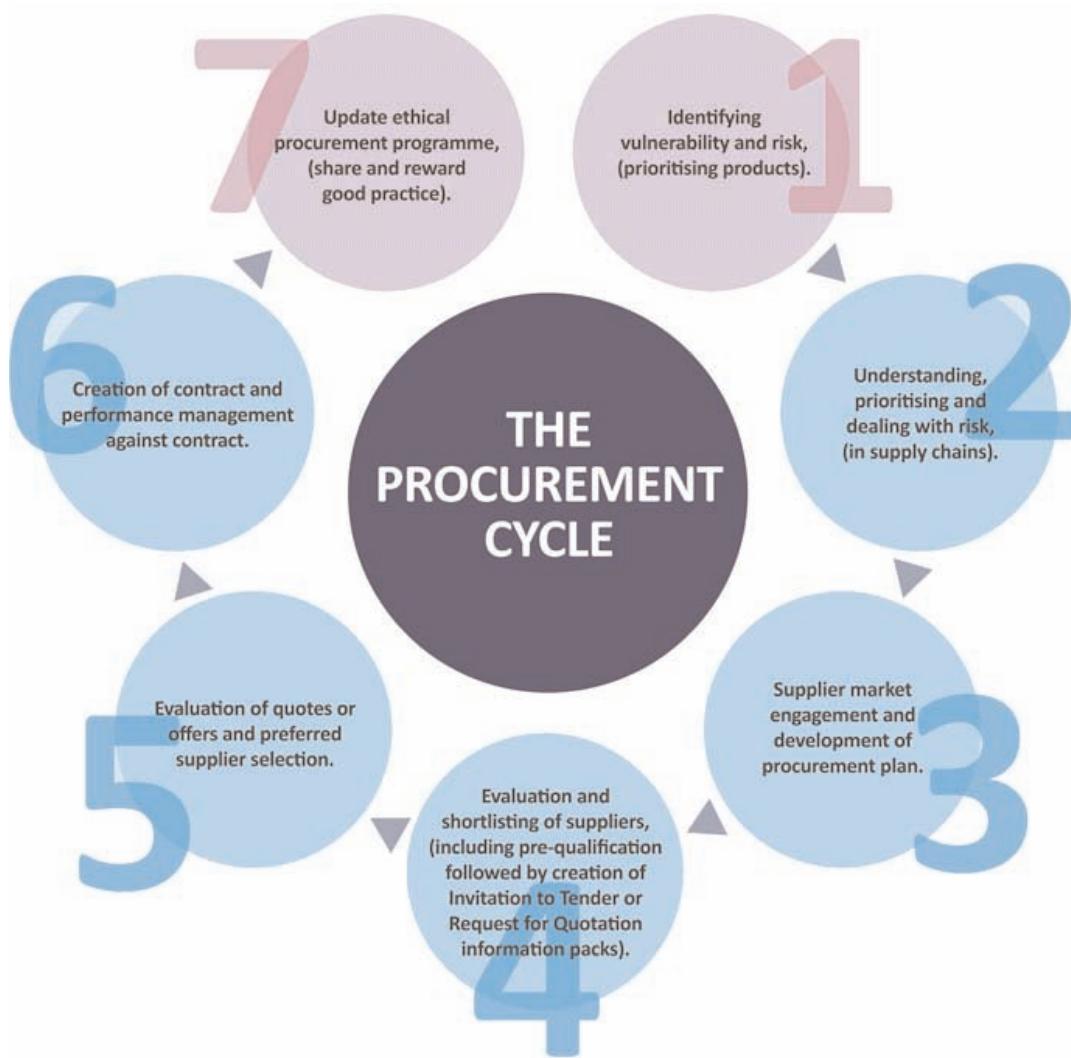
- collect and provide all parties with the information they need to plan more effectively, (e.g. share audit reports)
- lead to efficient communications and formalised, streamlined buying and production processes
- empower procurement professionals to select and reward good practice and leadership of suppliers
- encourage buyers and suppliers to collaborate with organisations who have expertise in addressing systematic problems within the supply chain
- identify and address unacceptable practices like fraud, bribery and modern slavery
- enable the buyer to collaborate with others who are purchasing from the same supplier (where appropriate).

JBS Group recognises the shared responsibility for suppliers to implement good workplace practices and for buyers to select, enable and encourage good performance by suppliers. Where bad performance is identified, especially where it concerns conduct that violates minimum standards, this should be addressed as a priority.

The Procurement Cycle

A detailed procurement cycle breaks down into seven major stages. The following section examines each of these stages, highlighting good practice and, specifically, what a buyer should bear in mind.

- Stages 1 and 7 focus on the ethical/responsible purchasing programme covering all purchases
- Stages 2 – 6 are the stages a purchasing organisation goes through in relation to each purchase



In brief:

Stage 1: An organisation needs to identify risks and vulnerabilities in its supply chain to be able to prioritise its actions to improve social and environmental impacts.

Stage 2: Understanding, prioritising and dealing with risk. If it is not already clear from the Code of Conduct and procurement policies, procurement professionals should work with internal colleagues who requisition products, as well as other colleagues, to shape the technical, social and/or environmental criteria of the specification.

Stage 3: Supplier market engagement and development of procurement plan. Engage with suppliers to assess which meet our desired standards. Assess the economic situation of the workers in the supply chain. Procurement professionals give feedback to internal colleagues on what the market is able to provide, and the implications of different sourcing approaches, including timings.

Stage 4: Evaluation and shortlisting of suppliers. During this stage buyers reinforce to suppliers the importance of environmental and social performance, and assess

suppliers' willingness to meet ethical standards.

Stage 5: Evaluation of quotes or offers and preferred supplier selection. When buyers assess pre-qualification questionnaires, tenders or audit reports from suppliers abroad, it is important to look for inter-related elements.

Stage 6: Creation of contract and performance management against contract. The economic and business parameters which are negotiated impact social responsibility through a series of positive or negative consequences for the supplier or the environment. Ethical procurement and sustainability targets should be included in the contract as well as in the specification. Buyers need to assess supplier performance against the desired level of social or environmental performance, focusing on elements identified in corrective action plans or improvement initiatives recorded in the contract.

Stage 7: Update ethical procurement programme including standard setting and share and reward good practice. Identify root causes and barriers to improvement Act to address root causes.

equal opportunities

Introduction

JBS Group recognises the requirements of the 2010 Equalities Act. We believe that it is essential to provide equal opportunities to all persons without discrimination. This policy sets out the organisation's position on equal opportunity in all aspects of employment, including recruitment and promotion, giving guidance and encouragement to employees at all levels to act fairly and prevent discrimination on the grounds of sex, race, marital status, part-time and fixed term contract status, age, sexual orientation or religion.

Statement of policy

- (a) It is the policy of JBS Group to ensure that no job applicant or employee receives less favorable treatment on the grounds of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion, or is disadvantaged by conditions or requirements that cannot be shown to be justifiable. We are committed not only to its legal obligations but also to the positive promotion of equality of opportunity in all aspects of employment.
- (b) JBS Group recognises that adhering to the Equal Opportunities Policy, combined with relevant employment policies and practices, maximises the effective use of individuals in both the organisation's and employees' best interests. JBS Group recognises the great benefits in having a diverse workforce with different backgrounds, solely employed on ability.
- (c) The application of recruitment, training, and promotion policies to all individuals will be on the basis of job requirements and the individual's ability and merits.
- (d) All employees of the organisation will be made aware of the provisions of this policy.

There are two main forms of discrimination either direct or indirect, JBS Group will ensure that all employees are not be subjected to discrimination in any form. These are detailed below.

Direct Discrimination

Direct Discrimination occurs where a person is treated less favorably than another person and where the reasons for the treatment are on one or more of the equality grounds. Disability-related discrimination occurs where, for a reason related to a disable person's disability, a person treats the disabled person less favorably than he treats or would treat,

other persons to whom that reason does not apply and he cannot show that the treatment in question is justified.

Failure to comply with the reasonable adjustment duty: Disability discrimination can also occur where an employer fails to comply with a duty to make reasonable adjustments in respect of a disabled job applicant or employee. The reasonable adjustment duty is imposed on an employer where a provision, criterion or practice is applied by the employer or the physical features of the employer's premises places the disabled person at a substantial disadvantaged compared to persons who are not disabled.

Indirect Discrimination

Indirect discrimination occurs where a provision, criterion or practice applies or would apply, equally to persons not of the same equality characteristic as another but:

- which puts or would put, persons of the same equality characteristic at a particular disadvantage when compared to other persons, and
- which is not a proportionate means of achieving a legitimate aim.

Harassment

Harassment is unwanted conduct which is related to any of the equality grounds and which has the purpose or effect of violating a person's dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. JBS Group will not tolerate the many forms of behavior that can constitute harassment:

- Physical conduct such as assaulting a person or making obscene gestures.
- Verbal conduct such as making racist, sexist or sectarian or homophobic remarks.
- Making derogatory comments about a persons age or disability
- Visual or written material containing racist, sexist or other derogatory words or pictures e.g. in posters, graffiti, letters or emails.

Victimisation

Victimisation occurs where a person is treated less favorably than other person because the person has made an allegation under one of the equality statutes, has given evidence or other information in connection with such proceedings, has alleged a contravention of the equality

statutes or has otherwise done anything under or by reference to the equality statutes. Individuals have a right to make a complaint without prejudice to their employment opportunities.

Responsibilities of JBS Group and Management

JBS Group is committed to implementing this policy and to making every effort to ensure that discrimination, harassment and victimisation does not occur.

We endeavor to:

- (a) Ensure that each manager, supervisor and employee is given a copy of the Equal Opportunities Policy.
- (b) Explain the policy to managers, supervisors and employees.
- (c) Ensure that all complaints of discrimination, harassment or victimisation are dealt with promptly, seriously and confidentially.
- (d) Set a good example by treating employees with fairness, dignity and respect.
- (e) Be alert to unacceptable behavior and take appropriate proactive action in accordance with this policy.
- (f) Monitor all incidents of discrimination, harassment and victimisation and review the effectiveness of this policy at least annually.

Employees Responsibilities

All employees within JBS Group must comply with this policy. You must treat others with dignity and respect and ensure that your behavior does not amount to discrimination, harassment or victimisation.

- (a) You are expected to discourage discrimination, harassment and victimisation by making it clear that you find such behavior unacceptable and by supporting employees who suffer such treatment.
- (b) Anyone who is aware of an incident of discrimination, harassment or victimisation should alert a manager or supervisor to enable it to be dealt with.
- (c) Allegations of discrimination, harassment or victimisation must be made in good faith.

Recruitment and Promotion

- (a) Advertisements for posts will give sufficiently clear and accurate information to enable potential applicants to assess their own suitability for the post. Information about vacant posts will be provided in such a manner that does not restrict its audience in terms of sex, race, marital status, disability, age, part-time or fixed term

contract status, sexual orientation or religion.

- (b) Recruitment literature will not imply a preference for one group of applicants unless there is a genuine occupational qualification which limits the post to this particular group, in which case this must be clearly stated.
- (c) All vacancies will be circulated internally.
- (d) All descriptions and specifications for posts will include only requirements that are necessary and justifiable for the effective performance of the job.
- (e) All selection will be thorough, conducted against defined criteria and will deal only with the applicant's suitability for the job. Where it is necessary to ask questions relating to personal circumstances, these will be related purely to job requirements and asked to all candidates.

Employment

- (a) JBS Group will not discriminate on the basis of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion in the allocation of duties between employees employed at any level with comparable job descriptions.
- (b) JBS Group will put in place any reasonable measures and/or adjustments within the workplace for those employees who become disabled during employment or for disabled appointees.
- (c) All employees will be considered solely on their merits for career development and promotion with equal opportunities for all.

Training

- (a) Employees will be provided with appropriate training regardless of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion.
- (b) All employees will be encouraged to discuss their career prospects and training needs with their Line Manager or the HR Department.

Grievances and Victimation

- (a) JBS Group emphasises that discrimination is unacceptable conduct which may lead to disciplinary action under the organisation's Disciplinary Procedure.
- (b) Any complaints of discrimination will be pursued through the organisation's Grievance Procedure, as outlined in the Employee handbook.

diversity policy

JBS Group is committed to developing the diverse skills and experiences of all. We respect our employees, clients, candidates and investors throughout the world without regard to their differences or similarities. Our actions and behaviours must demonstrate and confirm our respect for each other and each other's contributions.

JBS Group is committed to the goals of equal opportunity and affirmative action in employment. It aims to provide a work environment for staff that fosters fairness, equity, and

respect for social and cultural diversity, and that is free from unlawful discrimination, harassment and vilification as determined by current and future legislation.

To reinforce this commitment in our daily work all company activities, policies, practices and procedures are to be carried out in accordance with this policy. Each employee is personally responsible and accountable for ensuring that her/his actions and behaviours reflect this policy.