

Principle 1: Governance through integrity

We work with integrity and fairness and we manage our risk ethically and transparently. We seek the same from those with whom we do business, both directly and indirectly. Above all, we believe in respecting and complying with statutory law and regulation.

No employee may directly or indirectly solicit a bribe. We do not offer or accept personal gifts, political donations or other dealings that might reasonably be believed to influence the decision-making process, or that might bring our company into disrepute.

What does this mean?

- Operating with integrity is considered important because attributes such as honesty and fairness are considered critical to business success and ensuring the trust of shareholders. Acting in an opposite manner to this may place our company in a susceptible position in respect of the costs involved with reputation damage.
- We feel it is good business practice to promote values of integrity and honesty in our business environments.
- This Principle also rejects any action that might be construed to influence democratic decision-making processes, such as political donations.

International Law and best practice

- Business Principles for Countering Bribery (2003).
- Global Reporting Initiative (GRI, 1997-ongoing): indicators SO2-3 and SO5.
- International Anticorruption and Good Governance Act (2000).
- OECD Convention for Combating Bribery of Foreign Public Officials in International Business Transactions (1997).
- Sarbanes-Oxley Act (US, 2002).
- UN Global Compact (2000): Principles 1 (respect & protection of internationally acclaimed human rights) and 2 (non-complicity in rights abuses).
- UN Norms - (2002): No. 11 – national sovereignty and bribery.

Policies, practice and tools

- We have a zero tolerance policy for those employees involved in bribery
- We implement Sarbanes-Oxley Act in our operations by 2009
- We educate our employees
- We regularly audit the implementation of our policies
- We perform risk assessments

Principle 2: We optimize shareholders value

We strive to achieve the highest standards of business practice. This enables us to contribute to long-term sustained value creation for the benefit of shareholders, employees, host countries, business partners and local communities. All business transactions must be reflected accurately in our accounts in accordance with established procedures and auditing standards. Accounting records will reflect and describe the nature of the underlying transactions.

What does this mean?

- Transparency is a pre-requisite for trust and it is the way of accounting and auditing financial performance.
- All business transactions must be properly recorded, accounted for and made available to the public for their scrutiny. It means that stakeholders (especially shareholders) should be able to trust the information that is presented as representing a fair and reliable picture of financial health.
- This Principle refers to the integrity of governance structures for our decision-making. Secondly, the Principle also refers to financial integrity and the financial information given to its shareholders and employees.

International Law and best practice

- Global Reporting Initiative (GRI, 1997-ongoing): indicators EC1-12
- The Sarbanes-Oxley Act (US, 2002).
- The Turnbull Report (1999) and The Cadbury Report (1992)
- UN Global Compact (2000): Principle 2 - non-complicity in human rights abuses.
- UN Norms (2002): No.15 - rules of operation and implementation.
- IFRS, USGAAP, BRGAAP



Policies, practice and tools

- Full compliance to IFRS, USGAAP and BRGAAP in our financial reporting
- We ensure independence of the company's auditors in terms of any consulting arrangement.
- We implement Sarbanes-Oxley Act in our operations by 2009
- We educate our employees
- We regularly audit the implementation of our policies
- We perform risk assessments

Principle 3: We promote a healthy work environment

We are committed to providing healthy, safe and decent working conditions for all of our employees and expect our suppliers to do the same. We actively encourage diversity and opportunity. We also respect the rights of employees to join lawful trade unions or to form workers' associations. We respect the right to collective bargaining. As a minimum, we will fully comply with all relevant national laws and regulation with regards to working hours and conditions, rates of pay and terms of employment. We provide training to our employees on how to manage challenges arising from implementing these Principles.

What does this mean?

Freedom of Association and Right to Collective Bargaining

- We respect the right of all personnel to form and join trade unions of their choice and to bargain collectively.

Health and Safety

- We provide a safe and healthy working environment and take adequate steps 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.
- Clear information in both written and oral forms and in languages that are familiar to employees are provided about health and safety standards relevant to employees' activities.
- Appropriate procedures for dealing with emergencies and accidents are available; personal protective clothing is provided as appropriate and emergency and first aid equipment is regularly checked and updated. Appropriate training in first aid is given to nominated individuals in the workplace.
- Provision of adequate hygienic washing and toilet facilities commensurate with the number and gender of staff employed. The company shall ensure that dormitory facilities are clean, safe, and meet the basic needs of the personnel.

International Law and best practice

- Global Reporting Initiative (GRI, 1997-ongoing): indicators HR5, LA3, LA13 and LA15.
- ILO Convention No. 135 concerning Workers' Representatives (1971), No. 154 concerning Collective Bargaining (1981), No. 87 concerning Freedom of Association and Protection of the Right to Organise (1948), No. 98 concerning the Right to Organise and Collective Bargaining (1949).
- UN Global Compact (2000): Principle 3 – freedom of association and the effective recognition and right to collective bargaining.
- Global Reporting Initiative (GRI, 1997-ongoing): indicators LA5-8 and LA14-14
- ILO Convention No. 111 concerning Discrimination (1958), No. 120 concerning Hygiene (1964).
- ILO Convention No. 148 concerning Working Environment (1977), No. 155 concerning Occupational Safety and Health (1981), No. 174 concerning the Prevention of Major Industrial Accidents (1993).
- ILO Declaration on the Fundamental Principles and Rights at Work (1998).
- UN Global Compact (2000): Principles 1 (respect and protection of internationally acclaimed human rights) and 2 (non-complicity in human rights abuses).
- UN Norms (2002): No. 7 – provision of a safe and healthy working environment.



Forced Labour

- We shall not engage in or support the use of forced labour, nor shall personnel be required to lodge 'deposits' or identity papers upon commencing employment.
- We comply with applicable laws and industry standards on working hours, and do not oblige employees to work excessive or anti-social hours involuntarily.

Child Labour

- We shall not engage in or support the use of child labour as defined above in the general definitions.

Discrimination

- We will not engage in or support discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age.
- The basis for recruitment, placement, training and advancement for staff at all levels is based on skills, experience or appropriate qualifications. Equal opportunities policies should be put in place and systems for monitoring compliance should be undertaken.

Policies, practice and tools

- We implement occupational health and safety systems according to OHSAS 18001
- We ensure that responsibility for labour, health and safety issues should be assigned to a senior management representative in order to establish systems of clear communications between employer and employee representatives on these issues;

- Global Reporting Initiative (GRI, 1997-ongoing): indicators HR3, HR6-7.
- ILO Convention No. 105 concerning Abolition of Forced Labour (1957), No. 29 concerning Forced Compulsory Labour (1930).
- Slavery Convention (1927).
- UN Global Compact (2000): Principle 4 – elimination of forced and compulsory labour.
- UN Norms (2002): No.5 (forced and compulsory labour) and No.16 (monitoring).
- Global Reporting Initiative (GRI, 1997-ongoing): indicator HR6
- ILO Convention No. 138 concerning Minimum Age (1973), No. 182 concerning Worst Forms of Child Labour (1999).
- ILO Convention Recommendation No. 190 concerning Worst Forms of Child Labour (1999);
- ILO Recommendation No. 146 concerning Minimum Age (1973).
- UN Convention on the Rights of Child (1990): Article 1
- UN Global Compact (2000): Principle 5 – abolition of child labour.
- UN Norms (2002) No. 6 – rights of children.
- ECHR (1950): Article 14 – prohibition of discrimination.
- Global Reporting Initiative (GRI, 1997-ongoing): indicators HR4, HR8, LA10-11 and LA16-17.
- ILO Convention No. 100 concerning Equal Remuneration (1951), No. 111 concerning Discrimination (1958).
- ILO Declaration on Fundamental Principles and Rights at Work (1998).
- UN Global Compact (2000): Principle 6 – elimination of discrimination.
- UN Norms (2002): No. 2 – right to equal opportunity and non-discriminatory treatment.

Principle 4: Our community investment

We are committed to playing a positive role in society as a corporate citizen, optimising the positive aspects of our operations wherever we work. Wherever possible, and where there is no conflict with centrally managed purchasing strategy, we will recruit locally and we will establish business relationships with local suppliers, respecting regional development initiatives. We believe in community investment activities and charitable work that supports capacity building and that strategically aligns with our core business purpose. We will therefore harness our logistics and transportation skills and networks to support those in need, particularly where humanitarian assistance is required.



What does this mean?

- Our policy is to contribute to the sustainable development goals of the communities where we operate and make a positive difference through our programmes of social investment in them.
- This also means that when we make an investment and undertake an impact assessment, we should do so in line with best practice relating to public participation in environmental decision-making.
- This means that our sphere of influence and business activities will be fully in line with our Business Principles.

International Law and best practice

- Aarhus Convention (1998).
- Global Reporting Initiative (GRI, 1997-ongoing): indicators HR12-14, SO1.
- International Covenant on Economic, Social and Cultural Rights (1966).
- UN Global Compact (2000): Principles 1 (respect and protection of internationally acclaimed human rights) and 2 (non-complicity in human rights abuses).
- UN Norms (2002): 10 (recognition of national legislation) and 12 (respect of civil, cultural, economic and political rights).

Policies, practice and tools

- Implementation of the green operational principles

Principle 5: We care about our customers, suppliers & sub-contractors

By building long-term relationships with our customers, suppliers and subcontractors, we are committed to delivering high quality and best value services. We will meet the highest standards of security through our value chain and strive to ensure that trust is the basis of all our relationships in society. We are committed to meeting the expectations of our customers in respect of responsible business practice.

What does this mean?

- This Principle means that our investment decisions will take account of the economic, environmental and social impacts that they may have and to alter their management accordingly in order to satisfy demands of high quality products and security.
- This Principle also means that we will develop and implement systems of monitoring, both internal and external, that will allow us to maintain awareness of any activity(s) that should fall out of line with this Principle throughout our supply chain.

International Law and best practice

- Consumer Protection Act (1987).
- Sarbanes-Oxley Act (2002).
- UN Global Compact (2000): Principle 1 – support and respect for internationally proclaimed human rights.
- UN Norms (2002): No. 4 (security arrangements), 13 (consumer protection).
- Global Reporting Initiative (GRI, 1997-ongoing): indicators PR1-8.

Policies, practice and tools

- We ensure that the values of this Principle are instilled and built within the contracts concerning customers and supply chains;
- Implementation of our procurement policy
- Ensure the integrity of our SuperVerde™ brand
- We install an ERP system by 2009 to facilitate our customers and suppliers just in time delivery
- We monitor our customer satisfaction and loyalty



Principle 6: Environment and precautionary approach

We will contribute to the development of sustainable renewables. We are committed to understanding, reducing and managing our environmental impacts. We are aware of the need to demonstrate continuous improvement and a precautionary approach in relation to those environmental aspects that are important to us and to our stakeholders. These aspects include, but are not restricted to: global warming, resource conservation, preservation of natural habitats, use of land, ecological agriculture.

What does this mean?

- We manage all issues of the environment policy as integral parts of company business and planning.
- We assess potential environmental impacts on land, water, air and biodiversity when planning any agricultural development or expansion, and include recommendations for reducing possible negative environmental impacts.
- We comply with environment legislation requirements and follow global trends and standards.
- We conserve biodiversity, energy and water, and other natural resources through employing, wherever practical, the principles of reduction, recovery, re-use and recycling.
- We ensure all independent contractors follow environmental practices consistent with these guidelines.

Integrated Pollution Prevention and Control

- We shall aim to prevent, reduce and eliminate pollution at source through the efficient use of natural resources and the establishment of an integrated environmental management system.

Policies, practice and tools

- We implement our green operations principles
- We achieve ISO14001 accreditation by 2008

International Law and best practice

- Global Reporting Initiative (GRI, 1997-ongoing): indicators EN1-35.
- Intergovernmental Panel on Climate Change (IPCC). Special report on 'Aviation and the Global Atmosphere' (1999).
- Kyoto Protocol to the UN Framework Convention on Climate Change (1998).
- Precautionary Principle (UN Conference on Environment and Development, 1987); and EC advisory communication (COMM, 2000/1).
- Rio Declarations on Environment and Development (1992). Including Agenda 21 (1992): Section 2 – conservation and management of resources.
- The Convention on Biological Diversity (1992).
- The Montreal Protocol on Substances That Deplete the Ozone Layer (1987).
- UN Global Compact (2000): Principles 7 (precautionary approach), 8 (initiatives to promote environmental responsibility) and 9 (encouragement and diffusion of environmentally friendly technologies).
- Council Directive 96/61/EC of 24 September 1996 concerning integrated pollution prevention and control.

