



**Divitel Corporate
Social Responsibility
Policy 2015**

The engineers behind the screen.



Divitel Corporate Social Responsibility Policy 2015

To Divitel, Corporate Social Responsibility (CSR) is a key element of our company culture. Through our technological services, we can address the challenges of today and tomorrow. Challenges related to energy, waste, water treatment, traffic and food supply. We also help our clients meet their sustainability targets with technology that improves society.

To achieve this, we have formulated objectives and activities relating not only to our services, but also to our own business operations and processes. However, we cannot do this alone. As a high tech-company, we are part of an ecological supply chain. A chain that is becoming increasingly complex with a network of national and international suppliers, service providers and subcontractors, together to be called “ECO-partners”.

In this Code of Sustainable Supply, we have identified our ambitions when it comes to CSR. Together with our ECO-partners, we believe in the sustainable quality of our technological solutions which can provide a contribution to a better world. That’s why we trust that we can rely on your support. Suppliers are expected to maximally comply with the Code of Sustainable Supply. This enables Divitel to ensure that social responsibility principles are well applied throughout the supply chain of products and services. Obviously, Divitel is willing to work with Suppliers and support them to achieve compliance with this Code. As our Eco=Partners are generally not at the beginning of the supply chain, Divitel expects them to translate the ambition set forth in this document to their suppliers as well.

Freely Chosen Employment

Divitel does not accept any form of forced labour. All work will be voluntary and employees shall be free to leave upon reasonable notice. It is not acceptable that employees are required to pay a deposit in order to be able to work or that employees are required to lodge identification documents with the employer upon commencing employment. It is also not acceptable to withhold a person’s salary, benefits, property or documents.

Child Labour Avoidance

Child labour is not to be used in any stage of the supply chain. The term ‘child’ refers to any person under the age of 15 (or 14 where the law of the country permits, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest). Our ECO-Partners should apply legitimate workplace apprenticeship programs, which comply with the Convention on the Rights of the Child, the ILO Minimum Age Convention (C.138-1973) or the Prohibition and Immediate Elimination of the Worst Forms of Child Labour Convention (C.182-1999). Employees under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young employees.

Working Hours

Workweeks neither within Divitel nor by our ECO-Partners are to exceed applicable legal limits. In countries where the maximum workweek is less, national laws and benchmark industry standards

will apply, whichever offers greater protection. Employees may refuse overtime without any threat of penalty, punishment or dismissal. Supplier will provide employees with all legally mandated leave, including maternity leave, paternity leave, compassionate leave and annual leave.

Wages and Benefits

Salaries and other benefits shall be paid to employees in compliance with all applicable local wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, employees shall be compensated for overtime at pay rates greater than regular hourly rates. The basis on which employees are being paid is to be provided in a timely manner and communicated via pay stub or similar documentation.

Humane Treatment

ECO-Partners disciplinary policies and procedures shall be clearly defined and communicated to employees. In these policies it has to be stated there is to be no harsh and inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees: nor is there to be the threat of any such treatment.

Non-Discrimination

There is to be no discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. Employees with disabilities will be provided reasonable job accommodations as needed to perform their job function. This has to be demonstrated in a clear policy, which is communicated to employees.

Freedom of Association

Employees of ECO-Partners should, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively on their behalf. Employees representatives are not discriminated against and have access to carry out their representative functions in the workplace. They shall also enjoy adequate protection against acts of anti-union discrimination in respect of their employment. Where the right to freedom of association and collective bargaining is restricted under law, the Supplier facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Occupational Safety

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tag-out) and ongoing safety training. Where hazards cannot be adequately controlled by these means, employees are to be provided with appropriate, well-maintained, personal protective equipment. At least, Supplier has to fully comply with local law. Employees shall not be disciplined for raising safety concerns.

Emergency Preparedness

It is essential that all our ECO-Partners establish and maintain procedures to identify potential for and respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them. They shall review and revise, where necessary, its emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations. The organization shall also periodically test such procedures where practicable. Divitel will be granted insight into established procedures at its request.

Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to:

- worker reporting;
- classify and record (near) accidents, injuries and illness cases;
- provide necessary medical treatment;
- investigate cases and implement corrective actions
- to eliminate their causes;
- facilitate return of employees to work; and
- regularly audit whether the goals in terms of injury and illness are being fulfilled.

Dangerous and hazard full materials

Worker exposure to chemical, biological and physical agents is to be timely identified, evaluated and controlled. Appropriate measures must be taken to control overexposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs. Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

Machine Safeguarding

Supplier's production and other machinery is to be evaluated for safety hazards at least once a year. The Supplier shall timely correct deficiencies. Corrective actions shall be taken with the intention of resolving the issue, followed up to ensure their effectiveness. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to employees.

Sanitation, Food and Housing

Employees are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier are to

be maintained clean and safe, and provided with appropriate emergency exits, hot water for bathing and showering, and adequate heat and ventilation and reasonable personal space along with reasonable entry and exit privileges.

Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current. Their operational and reporting requirements are to be followed. Divitel's preference is to report in accordance with the GRI guidelines.

Pollution Prevention and Resource Reduction

Supplier will make continual progress toward eliminating and reducing waste of all types, including water and energy, at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials. Supplier will make continual progress toward using green energy at least showing that the share of renewable energy versus fossil energy is significantly increasing. All policies, actions, measurements, performance indicators, reports and results regarding these policies shall be available on Divitel's request.

Wastewater and Solid Waste

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

Carbon Footprint

Supplier shall measure its CO₂ footprint and report this, on request, to Divitel on a yearly basis. This report includes a plan for reduction.

Product Content Restrictions

Supplier is to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labelling for recycling and disposal.

Company Commitment

Supplier possesses or is demonstrably busy developing corporate social and environmental responsibility policy statements affirming Supplier's commitment to compliance and continual improvement, endorsed by executive management.

Management Accountability and Responsibility

Supplier clearly identifies (a) company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management shall review the status of the management system on a regular basis. A member of the board of the Supplier shall be responsible for Corporate Social Responsibility.

Legal and Customer Requirements

The management system shall contain identification, monitoring and understanding of applicable laws, regulations and customer requirements.

Risk Assessment and Risk Management

The Supplier will regularly identify hazards and assess risks associated with its activities. The Supplier shall timely take appropriate action to manage the risks and hence prevent or reduce the impact of potential accidents or incidents. These corrective actions need to be taken with the intention of resolving the issue, followed up to ensure their effectiveness and must reflect the scope of the gravity of the problems involved.

Improvement Objectives

Supplier's management system shall include written performance objectives, targets and implementation plans to improve the Supplier's social and environmental performance, including a periodic assessment of Supplier's performance in achieving those objectives.

Training

Supplier needs to provide their employees with adequate education and training about environmental issue regarding its primary processes, waste management systems, health and safety issues.

Communication

Supplier's management system shall contain a process for communicating clear and accurate information about Supplier's policies, practices, expectations and performance to workers, its own suppliers and customers.

Worker Feedback and Participation

The management system should contain on-going processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

Audits and Assessment

Supplier shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

Documentation and Records

Supplier shall create and maintain documents and records to ensure regulatory compliance and conformity with appropriate.

Business Integrity

Fair competition is very important for Divitel. The highest standards of integrity are to be expected in all business interactions. Divitel does not accept any form of corruption, extortion or embezzlement. Supplier hereby fully adheres to all applicable competition and anti-bribery laws and regulations and rejects amongst others price fixing and market sharing arrangements.

No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

Disclosure of Information

Means to effectively safeguard customer information regarding business activities, structure, financial situation, performance, and/or any other information deemed confidential shall be disclosed only in accordance with the guidelines specified within any agreed upon non-disclosure agreement between Supplier and Divitel and within the guidelines of all applicable laws and regulations.

Intellectual Property

Supplier shall have a policy not to use intellectual property, such as copyrights, trademarks, patents or software belonging to customers, without explicit permission. Also, Supplier will refuse to acquire commercial information by dishonest or unethical means, such as industrial espionage.

Protection of Identity

Supplier shall have programs in place that ensure the confidentiality and protection of whistle blowers. A whistle blower is defined as any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body. Summarizing the previous sections, Divitel can request information on:

- Health & Safety: Emergency Preparedness;
- Environmental: Pollution Prevention and Resource Reduction;
- Environmental: Carbon Footprint.

References. The following standards were used in preparing this Code and may be a useful source of additional information:

- EICC (Electronic Industry Citizenship Coalition) – www.eicc.info
- Convention on the Rights of the Childs – www2.ohchr.org/english/law/pdf/crc.pdf
- ILO Prohibition.