

Glen Dimplex Code of Business Ethics and Conduct

We confirm that we have read the attached Code of Business Ethics and Conduct and agree to comply with its terms.

Signed:

Company:

Position:

Date:

To completed by GlenDimplex representative.

Audited by:

Company:

Position:

Date:

The purpose of this “Code of Business Ethics and Conduct” (“Code”) is to describe how Glen Dimplex conducts and expects its suppliers to conduct its business in an ethical socially responsible way.

Glen Dimplex is committed to ensuring that working conditions in Glen Dimplex are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible. Glen Dimplex suppliers (“Suppliers”) commit, in all of their activities, to operate in full compliance with all the laws, rules, and regulations of the countries in which they operate. This Code goes further, drawing upon internationally recognized standards, in order to advance social and environmental responsibility. The provisions of this Code constitute minimum and not maximum standards. It should not be used to prevent companies from exceeding these standards. Where the provisions of law and this Code address the same subject, the provision which affords the greater protection should be applied.

Glen Dimplex requires that Suppliers implement this Code using the management systems described below. Glen Dimplex reserves the right to visit (and/or have external monitors visit) Supplier facilities, with or without notice, to assess compliance with this Code and to audit Supplier’s wage, hour, payroll, and other worker records and practices. Violations of this Code may result in immediate termination as a Glen Dimplex Supplier and (where required) in legal action.

The Code is modeled on and contains language from the following sources:

- the Electronic Industry Code of Conduct;
- recognized standards such as the Universal Declaration of Human Rights (UDHR); and
- standards issued by organisations such as the International Labour Organization (ILO), Social Accountability International (SAI), and the Ethical Trading Initiative (ETI)

The above were used as references in preparing this Code and may be useful sources of additional information. A complete list of references is provided at the end of this Code. As an extension of the Code, Glen Dimplex maintains a series of detailed policies that clarify our expectations for compliance.

Labour and Human Rights

Suppliers must uphold the human rights of workers, and treat them with dignity and respect as understood by the international community.

Non-Discrimination

Suppliers shall not discriminate against any worker based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, and termination. Suppliers shall not require a pregnancy test or discriminate against pregnant workers except where required by applicable laws or regulations or prudent for workplace safety. In addition, Suppliers shall not require workers or potential workers to undergo medical tests that could be used in a discriminatory way except where required by applicable laws or regulations or prudent for workplace safety.

Humane Treatment

Suppliers shall commit to a workplace free of harassment. Suppliers shall not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, or unreasonable restrictions on entering or exiting company-provided facilities. Suppliers shall prohibit harassment and unlawful discrimination in the workplace.

Prevention of Involuntary Labour and Human Trafficking

Glen Dimplex is committed to ensuring that all of the organisations and Suppliers do not accept any form of exploitation. Suppliers shall not violate any international anti-slavery conventions, and applicable anti-slavery laws and regulations of the countries in which they operate, and shall not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labour. This includes the transportation, harbouring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Suppliers shall ensure that third-party agencies providing workers are compliant with the provisions of the Code and the laws of the sending and receiving countries, whichever is more stringent in its protection of workers. Suppliers shall ensure that contracts for both direct and contract workers clearly convey the conditions of employment in a language understood by the worker. Where workers are required to pay a fee in connection with obtaining employment, Suppliers shall be responsible for payment of all fees and expenses in excess of the amount of one month of the worker's anticipated net wages. Such fees and expenses include, but are not limited to, expenses associated with recruitment, processing, or placement of both direct and contract workers. Glen Dimplex reserves the right to request that Suppliers demonstrate that they have policies and procedures in place to ensure that the potential for slavery and human trafficking is significantly reduced.

Child Labour avoidance

Child labour is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be 15 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher.

This Code does not prohibit participation in legitimate workplace apprenticeship programs that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138. Workers under the age of 18 shall not perform work that is likely to jeopardise the health or safety of young workers. Juveniles shall not be expected to work at night or carry out activities that are potentially hazardous or injurious to their health and development.

Juvenile Worker Protections

Suppliers may employ juveniles who are older than the applicable legal minimum age for employment but are younger than 18 years of age, provided they do not perform work likely to jeopardise their health, safety, or morals, consistent with ILO Minimum Age Convention No. 138.

Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Work weeks are not to exceed the maximum set by local law. Further, a work week should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off per seven-day week.

Wages and Benefits

Suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, workers shall be compensated for overtime hours at the premium rate required by applicable laws and regulations. Suppliers shall not use deductions from wages as a disciplinary measure. Suppliers shall offer vacation time, leave periods and holidays consistent with applicable laws and regulations.

Suppliers shall pay workers in a timely manner and clearly convey the basis on which workers are being paid.

Freedom of Association and Worker Representation

Suppliers must respect the right of workers to associate freely with, form, and join workers' organisations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations. Suppliers shall not discriminate with respect to employment based on union membership and, in particular, shall not make employment subject to the condition that the worker relinquish union membership or agree not to join a union or cause the dismissal of or otherwise prejudice a worker by reason of union membership or participation in union activities outside working hours (or within working hours if the Supplier has consented to such activities or if required by applicable laws or regulations). Suppliers shall protect against acts of interference with the establishment, functioning or administration of workers' organisations in accordance with applicable laws and regulations.

Where the right to freedom of association and collective bargaining is restricted under national law, Suppliers should facilitate and not hinder the development of parallel means of independent and free association and bargaining. In such circumstances, Suppliers are encouraged to share with their workers information which will affect working conditions and enable effective mechanisms for consultation.

Prohibition of procurement of conflict metals

Raw metals used in the electronics industry are, at times, sourced from regions of the world known as "conflict regions". Such are especially regions where mines are controlled by non-government military groups or unlawful military factions where the illegal mine(s) profits have contributed to human rights abuses, severe environmental damage, and theft from citizens. The Supplier is obliged to take appropriate due diligence and continuous monitoring of the supply chain as are reasonably necessary to avoid procurement or, use of conflict metals. Further the Supplier shall fully support Glen Dimplex efforts to keep its supply chain free from conflict metals and make its due diligence measures available to Glen Dimplex upon request.

Health and Safety

Glen Dimplex recognizes that integrating sound health and safety management practices into all aspects of business is essential to maintain high morale and provide innovative, high quality products and services as a high consistency of production. Suppliers shall commit to creating safe working conditions and a healthy work environment for all of their workers and also recognise that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.

Occupational Safety

Suppliers shall eliminate physical hazards where possible. Where physical hazards cannot be eliminated, Suppliers shall provide appropriate engineering controls such as physical guards, interlocks, and barriers. Where appropriate engineering controls are not possible, Suppliers shall establish appropriate administrative controls such as safe work procedures. In all cases, Suppliers shall provide workers with appropriate personal protective equipment. Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

Prevention of Chemical Exposure

Suppliers shall identify, evaluate, and control worker exposure to hazardous chemical, biological, and physical agents. Suppliers must eliminate chemical hazards where possible. Where chemical hazards cannot be eliminated, Suppliers shall provide appropriate engineering controls such as closed systems and ventilation. Where appropriate engineering controls are not possible, Suppliers shall establish appropriate administrative controls such as safe work procedures. In all cases, Suppliers shall provide workers with appropriate personal protective equipment.

Emergency Prevention, Preparedness, and Response

Suppliers shall anticipate, identify, and assess emergency situations and events and minimise their impact by implementing emergency plans and response procedures, including emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans.

Occupational Health and Safety Procedures and Systems

Suppliers shall establish procedures and systems to manage, track, and report occupational injury and illness. Such procedures and systems shall encourage worker reporting, classify and record injury and illness cases, investigate cases and implement corrective actions to eliminate their causes, provide necessary medical treatment, and facilitate the workers' return to work.

Physically Demanding Work

Suppliers shall identify, evaluate, and control worker exposure to physically demanding tasks, including manual material handling, heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

Sanitation, Food, and Housing

Suppliers shall provide workers with free access to clean toilet facilities, access to potable water, and sanitary food preparation and storage facilities. Worker dormitories provided by the Supplier or a third-party agency shall be clean and safe and provide adequate emergency egress, hot water for bathing and showering, adequate heat and ventilation, reasonable personal space, and reasonable entry and exit privileges.

Health and Safety Communication

In order to foster a safe work environment, Suppliers shall provide workers with appropriate workplace health and safety information and training, including written health and safety information and warnings, in the primary language of the workers. Suppliers shall post, in the primary language of its workers, Material Safety Data Sheets for any hazardous or toxic substances used in the workplace, and properly train workers who will come into contact with such substances in the workplace.

Worker Health and Safety Committees

Suppliers are encouraged to initiate and support worker health and safety committees to enhance ongoing health and safety education and to encourage worker input regarding health and safety issues in the workplace.

Environmental Impact

At Glen Dimplex, we recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimised while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

Suppliers shall commit to reducing the environmental impact of their designs, manufacturing processes, and waste emissions.

Hazardous Substance Management and Restrictions

Suppliers shall comply with the most recent laws and regulations prohibiting or restricting the use or handling of specific substances. To ensure safe handling, movement, storage, recycling, reuse, and disposal, Suppliers shall identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal.

Solid Waste Management

Suppliers shall manage and control the disposal of non-hazardous solid waste generated from its operations as required by applicable laws and regulations.

Wastewater and Storm water Management

Suppliers shall monitor, control, and treat wastewater generated from operations before discharge as required by applicable laws and regulations. Suppliers shall take appropriate precautions to prevent contamination of storm water runoff from their facilities.

Air Emissions Management

Suppliers shall characterise, monitor, control, and treat air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated from operations, as required by applicable laws and regulations, before discharge.

Environmental Permits and Reporting

Suppliers must obtain, maintain, and keep current all required environmental permits (for example, discharge monitoring) and registrations and follow the operational and reporting requirements of such permits.

Pollution Prevention and Resource Reduction

Suppliers must endeavour to reduce or eliminate solid waste, wastewater, and air emissions, including energy-related indirect air emissions, by implementing appropriate conservation measures in their production, maintenance, and facilities processes, and by recycling, reusing, or substituting materials.

Product Content Restrictions

Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

Ethics

Suppliers must be committed to the highest standards of ethical conduct when dealing with workers, suppliers, and customers.

Business Integrity

Corruption, extortion and embezzlement, in any form, are strictly prohibited. Suppliers shall not violate any international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate, and shall not engage in corruption, extortion, or embezzlement in any form. Suppliers shall not offer or accept bribes or other means to obtain an undue or improper advantage. Suppliers must uphold fair business standards in advertising, sales, and competition. All business dealings should be transparently performed and accurately reflected on Supplier's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

Bribery

The Supplier's employees shall not directly or indirectly offer, request or accept, nor make any agreements herewith for, any bribes and/or iniquitous and illegal interests. Such interests shall include, but not be limited to kickbacks, gifts and gratuity, entertainment, transportation and accommodation. Small gifts and presents of minor value, in line with normal culturally and socially acceptable standards, are not considered to fall under this ruling. All employees of the Supplier shall be obliged to dissuade the business partner or its employees from conducting attempts at bribery. They shall not, directly or indirectly, request for, accept take or make agreements for any bribes and/or iniquitous and illegal interests from any business partner or cause to favour himself/herself, his/her related persons and/or assignees.

Disclosure of Information

Suppliers must accurately record and disclose information regarding their business activities, structure, financial situation and performance in accordance with applicable laws and regulations and prevailing industry practices.

Whistleblower Protection and Anonymous Complaints

Suppliers shall create programmes to ensure the protection of Supplier and worker whistleblower confidentiality and prohibit retaliation against workers who participate in such programs in good faith or refuse an order that is in violation of the Code. Suppliers shall provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations.

Community Engagement

Suppliers are encouraged to engage the community to help foster social and economic development and to contribute to the sustainability of the communities in which they operate.

Non-Retaliation

Suppliers should have a communicated process for their workers to be able to raise any concerns without fear of retaliation.

Management Commitment

Suppliers must adopt or establish a management system designed to ensure compliance with this Code, applicable laws and regulations and customer requirements related to the participant's operations and products; identify and mitigate related operational risks; and facilitate continuous improvement. ISO 14001, OHSAS 18001, and Eco-Management and Audit Scheme (EMAS) may be useful resources. The management commitment should contain the following elements:

Company Statement

Supplier should have a corporate social and environmental responsibility statement affirming the Supplier's commitment to compliance and continual improvement, to be posted in the primary local language at all of the Supplier's worksites.

Management Accountability and Responsibility

Supplier should have clearly identified company representatives responsible for ensuring implementation and periodic review of the status of the Supplier's management systems.

Risk Assessment and Management

Supplier should maintain a process to identify environmental, health and safety, business ethics, labour, human rights, legal compliance risks associated with their operations, regulations and customer requirements, including the requirements of this Code; determine the relative significance of each risk and implement appropriate procedures and physical controls to ensure compliance and control the identified risks. Risk assessments for health and safety must include warehouse and storage facilities, plant and facility support equipment, laboratories and test areas, toilet facilities, kitchens, cafeterias.

Performance Objectives with Implementation Plans and Measures

Written standards, performance objectives, targets and implementation plans, including a periodic assessment of the Supplier's performance against those objectives, should be maintained.

Audits and Assessments

Supplier should conduct periodic self-evaluations to ensure that the Supplier, its subcontractors, and its next-tier Suppliers are complying with this Code and with applicable laws and regulations.

Documentation and Records

Supplier shall have processes to identify, monitor, and understand applicable laws and regulations and the additional requirements imposed by this Code. Supplier shall obtain, maintain, and keep current a valid business license as required by applicable laws and regulations.

Supplier shall have processes for creation of documents and records to ensure regulatory compliance and conformity to this Code, with appropriate confidentiality measures to protect privacy.

Training

Suppliers shall have programmes in place for training managers and workers to implement their policies and procedures and to fulfill improvement objectives.

Communication

Suppliers shall have a process for communicating clear and accurate information about their performance, practices, and expectations to its workers, suppliers and customers.

Worker Feedback and Participation

Suppliers shall have an ongoing process to assess employees' understanding of and obtain feedback on processes and practices related to this Code and to foster continuous improvement.

Corrective Action Process

Supplier shall have a process for timely correction of any deficiencies identified by an internal or external audit, assessment, inspection, investigation or review.

Supplier Responsibility

Supplier shall maintain a process to communicate Code requirements to Suppliers and to monitor Supplier compliance to the Code.

Miscellaneous

Consequences of violations

The breach of one of the rules of this declaration would have serious impact on the partnership between the Supplier and Glen Dimplex. Glen Dimplex reserves the right to terminate or cancel the business relationship to the Supplier by getting knowledge about any breach of this declaration.

Accountability for subcontractors

Supplier shall remain primarily responsible for the acts and omissions of its agents or subcontractors as though such acts or omissions were its own. In the event that any of Supplier's subcontractors shall breach any of the obligations as stated in this declaration, Supplier is obliged to give Glen Dimplex immediately written notice thereof and is further obliged to immediately terminate any business relationship to respective subcontractors.

Modifications and Additions

Glen Dimplex reserves the right to amend the Code from time to time and will notify the Supplier of any such amendment.

References

Eco-Management and Audit Scheme

www.quality.co.uk/emas.htm

Dodd-Frank Wall Street Reform and Consumer Protection Act

<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>

Electronic Industry Code of Conduct

www.eicc.info/eicc_code.shtml

Conflict free metal sourcing

www.conflictfreesmelter.org

Ethical Trading Initiative

www.ethicaltrade.org/

ILO Code of Practice in Safety and Health

www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf

ILO International Labour Standards

www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm

ISO 14001

www.iso.org

National Fire Protection Association

www.nfpa.org/categoryList.asp?categoryID=143&URL=About%20NFPA

Confederation of Fire Protection Associations International

<http://www.cfpa-i.org/index.html>

OECD Due Diligence Guidance

http://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html

OECD Guidelines for Multinational Enterprises

www.oecd.org

OHSAS 18001

www.bsi-global.com/index.xalter

SA 8000

www.cepaa.org/

SAI

www.sa-intl.org

United Nations Convention Against Corruption

www.unodc.org/unodc/en/corruption/index.html?ref=menuside8

United Nations Global Compact

www.unglobalcompact.org

Universal Declaration of Human Rights

www.un.org/Overview/rights.html

UN Norms on the Responsibilities of Transnational Corporations and Other Business Enterprises with Regard to Human Rights

www.ohchr.org
