

GLOBAL SOCIAL AND ETHICAL POLICY

Introduction

WWRD is committed to socially and ethically responsible sourcing practices, including ensuring the safe and fair treatment of all persons connected with us around the world. It is our policy to engage third parties who share our commitment to maintaining and, where necessary to improving, responsible sourcing practices.

WWRD complies with the principles of non-discrimination with regard to supplier selection and treatment.

Where necessary, we work with suppliers in order to remediate risks and perform additional due diligence so that we can continue to source responsibly.

Who Is Responsible For This Policy?

The Chief Executive Officer has overall responsibility for the effective operation of this policy and for ensuring compliance with applicable law.

Policy Objectives

WWRD is a member of SEDEX (Supplier Ethical Data Exchange Database):
www.sedexglobal.com.

Sedex enables member companies to manage efficiently the ethical and responsible practices of themselves and their global supply chain, generating transparency through the provision of a secure, robust and user-friendly database. WWRD companies and their product suppliers are registered Sedex members and are independently audited to the SMETA requirements (SEDEX Members Ethical Trade Audit).

The co-operation and willingness of all third parties engaged by WWRD to maintain safe and fair conditions for their workers is critical to WWRD. Where necessary, corrective action plans with reasonable time frames, to achieve these social and ethical standards are agreed with WWRD's suppliers and are validated to point of completion by independent 3rd party audit companies.

WWRD is not listed on any U.S. stock exchange and thus is not under an obligation to respond to the SEC requirements rules to implement reporting and disclosure requirements relating to "conflict minerals" as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Nevertheless, WWRD is aware of the difficult situation that products and components purchased from suppliers may contain minerals originating from conflict-affected countries.

Policy

WWRD will comply with the social and ethical standards set out below.

WWRD expects its suppliers to comply, and to require their sub-contractors throughout their supply chain to comply, with the social and ethical standards set out below.

Policy Principles

Social & Ethical Standards

Management systems and code implementation:

- Systems must be implemented and maintained to deliver compliance with this Policy.
- A senior member of management must be appointed, who is responsible for compliance with this Policy.
- WWRD and all third parties it engages are expected to communicate this Policy to all employees and entities within their supply chains and where necessary to encourage improvement on key issues.
- Management must understand the supply chain, and be willing to divulge its details for audit purposes.

Employment is freely chosen

- There must be no forced, bonded, illegal 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.

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.

Health and Safety

- Employers must provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.
- All premises must be safe, with risk of harm from hazardous activities, minimized through the provision of safety equipment, training and a safe infrastructure.
- There must be a Manager with responsibility for Health and Safety issues.
- There must be active, demonstrable, management and improvement of Health and Safety issues and a full investigation of any Health and Safety incident must take place.

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- Employers must comply with all local laws, regulations and procedures concerning Health and Safety.
- Employers must develop, maintain and regularly review a written Health and Safety policy. The policy must at the very least be aimed to comply with legal minimum safety and health standards, regulations and procedures.
- Employers must notify the relevant authorities of all illnesses and accidents as required by applicable laws. All illness, safety and accident reports must be maintained on site for at least one year, or longer if required by local law.
- Evacuation requirements - All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, the installation and maintenance of an employee alarm and emergency lighting systems, ensuring aisles/exits are not blocked and that workers are not blocked within their workstations, employee education, evacuation procedures, etc.) must be complied with. Workers must be trained in evacuation procedures.
- Alarm systems must be regularly tested and evacuation drills must be undertaken at least annually.
- Workers must be provided with effective and all necessary personal protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapours, noise, dust, etc.) to health and safety hazards, including medical waste. All equipment must be provided free of charge.
- All chemicals and hazardous substances must be properly labelled and stored in accordance with applicable laws. Labels must be placed in the local language and the language(s) spoken by workers, where different. Workers must receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances.

Child Labour

- All workers must meet the local legal minimum age, and/or a minimum age of 15 (14 where the law of the country of manufacture allows).
- Appropriate records on the ages of all workers must be held.
- Young persons up to the age of 18 should not work at night (between the hours of 10 p.m. and 6 a.m.), or on tasks that are potentially hazardous to their health.
- Policies and programmes that help the elimination of any exploitation of children in their industries must be developed and implemented.

Wages

- Wages and benefits paid for a standard working week must meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher
- All workers must 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.
- Any deductions made to the basic wage must be clearly understood, and reasonable in the context of the total wage - deductions not provided for by national law must

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not be permitted without the expressed permission of the worker concerned.

- Deductions from wages as a disciplinary measure must not be permitted.
- All disciplinary measures must be recorded.

Hours of Work

- Working hours must comply with national or local laws.
- All premises must hold appropriate records, showing the hours worked by each worker, both as part of their contractual agreement, and as overtime.
- Contractual hours must not exceed the maximum set by national or local laws.
- All overtime must be voluntary, should not exceed the maximum set by national or local laws and must not be demanded on a regular basis. Employees must be compensated for overtime hours in addition to their compensation for regular hours of work at such premium rate as is legally required in the country of manufacture or in those countries where such laws do not exist, at a rate at least equal to their regular hourly compensation rate.
- Workers must be provided with at least the minimum number of days off, and must not exceed the number of days of continuous working, required by national or local laws.
- Workers must be allocated breaks, the length and frequency of which is appropriate to the tasks undertaken.

Employee Relations

- There must be no unfair 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
- Workers must have a written contract of employment, the terms of which must be clearly communicated to the worker in a language or method that is understood.
- All disciplinary rules must be written and clearly communicated to workers in a language and / or method that is understood.
- There must be a clear recognised process of worker representation, to ensure good flow of communication between workers and management.

Regular employment is provided

- 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 must not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor may any such obligations be avoided through the excessive use of fixed-term contracts of employment.

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Harassment or Abuse

- Every employee must be treated with respect and dignity. No employee may be subject to any physical, sexual, psychological or verbal harassment or abuse.

Entitlement to Work and Immigration

- Only workers with a legal right to work may be employed or used by the supplier.
- All workers, including employment agency staff, must be validated for their legal right to work by reviewing original documentation.
- Employment agencies must only supply workers registered with them.
- Processes must be implemented to enable adequate control over agencies with regards to the above points and to all related legislation

Hygiene

- A clean and hygienic place of work and rest, consistent with local standards and the nature of the industry, must be provided.
- Workers must have access to acceptable drinking water at all times.

Accommodation

- Adequate provision must be made for prevention and fighting of fire.
- Accommodation must be comfortable and provide for an individual's privacy.
- Accommodation must be clean and hygienic.
- Recreational facilities must be provided within or accessible to the living area.
- Toilets and bathing facilities must be clean and hygienic.
- Where food preparation facilities are provided, they must be clean and hygienic

Environment

- An environment policy must be implemented and maintained.
- Continuous improvements must be made in environmental performance and, as a minimum, the requirements of local and international laws and regulations must be complied with.

Conflict Minerals

The term 'conflict minerals' is used to refer to tin, tungsten, tantalum and gold and the ores from which they originate, together with any other mineral or derivative determined from time to time by any governmental body to be financing conflict.

- The potential use of conflict minerals in materials and/or products supplied to WWRD must be disclosed to WWRD at its request, together with the source of such conflict minerals.
- Appropriate enquiry and due diligence must be conducted to confirm the source of all materials supplied to WWRD and/or used in the supply of products to WWRD and such enquiry and due diligence must be disclosed to WWRD at its request.
- Full evaluation of issues related to all materials supplied to WWRD and/or used in

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the supply of products to WWRD must be carried out and such evaluation must be disclosed to WWRD at its request.

- Conflict minerals must only be sourced from mines and smelters outside regions determined from time to time by any governmental body to be conflict regions or mines and smelters within such conflict regions which have been certified as 'conflict free' by an independent third party.

Breaches Of This Policy

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure.