



Company Code of Social Responsibility, Conduct and Ethics Policy

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(Code of Conduct)

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1.0 (Purpose)

As a company working we feel it is important to define our beliefs and policies with regards our ethical, moral and social principles as they relate to our business, staff, customers and suppliers.

2.0 (Scope)

This policy document is for the use of Williams Engineering Limited but is applicable to all our practices and may be flowed down to our suppliers.

3.0 (Authority and Responsibility)

It is the responsibility of the Management and Senior representatives of Williams Engineering to ensure this document reflects the beliefs and requirements of the company, and that it is maintained throughout our business practices.

4.0 (Labor standards)

Forced bonded or indentured labor, or involuntary prison labor, slavery or labor trafficking is not to be used. All work will be voluntary, and workers should be free to leave upon reasonable notice. Workers shall not be required to hand over government-issued identification, passports or work permits as a condition of employment.

4.1 (Child Labor Avoidance)

No person below the age of 16 is employed by Williams Engineering in any area of our operations.

4.2 (Working hours)

All working hours are in line with the Working Hours Legislation and all Employees are allowed to rest for at least one day per week minimum.

4.3 (Wages and Benefits)

All employees shall receive the minimum wage and benefits as a minimum requirement; however we pride ourselves on developing and rewarding our employees to a much higher level.

A written account (pay slip) is given to the employee during each pay period clearly indicating the employee's payments and indicating any deductions from the employee's pay.

4.4 (Humane Treatment)

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers: nor is there to be the threat of any such treatment.

4.5 (Non-discrimination)

We do not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training.

4.6 (Freedom of Association)

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The Company respects the rights of workers to join or not join labor unions. As provided by law, employees who become worker representatives shall not be the subject of discrimination and shall have access to management and co-workers in order to carry out their representative functions. Workers shall be able to communicate openly with management without fear of reprisal, intimidation or harassment.

5.0 (Health and Safety)

All members of Williams Engineering take the safety of our employees, visitors and the Public very seriously. We also believe that this should be flowed down to our supply chain and will regularly assess the performance of our suppliers to ensure that they are also maintaining the required levels of safety to meet today's social and ethical requirements.

5.1 (Occupational Safety)

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicle, and fall hazards) are controlled through proper design engineering and administrative controls, preventative maintenance and safe work procedures.

Where hazards cannot be adequately controlled by these means, workers are provided with appropriate personal protective equipment. Workers shall not be disciplined for raising safety concerns.

5.2 (Emergency preparedness)

Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

5.3 (Industrial Hygiene)

Any possible exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. When hazards cannot be adequately controlled by engineering and administrative means, workers are to be provided with appropriate personal protective equipment.

5.4 (Machine Safeguarding)

Physical guards, interlocks and barriers are to be provided and properly maintained for machinery used by workers.

5.5 (Sanitary and Welfare Facilities)

Workers are to be provided with clean toilet facilities, access to potable water and sanitary food preparation and storage facilities.

6.0 (Environmental)

As a an ISO14001 Certified organization we take our environmental consideration very seriously, to this end we monitor, develop procedures and implement processes to minimize the possible adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public.

6.1 (Environmental Permits and Reporting)

All required environmental permits (e.g. discharge monitoring) and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

6.2 (Pollution Prevention and Resource Reduction)

Waste of all types, including water and energy, are to be reduced or eliminated at the source by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

6.3 (Hazardous Substances)

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, recycling or reuse and disposal.

6.4 (Wastewater and Solid Waste)

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

6.5 (Air Emissions)

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

6.6 (Product Content Restrictions)

The Company adheres to all applicable laws and regulations regarding prohibition or restriction of specific substances including labeling laws and regulations for recycling and disposal.

7.0 (Management System)

The Company maintains a certified management system in line with AS9001. The management system has been designed to ensure compliance with applicable laws, regulations and customer requirements related to the company's operations and products. It also facilitates continual improvement. The management system contains the following elements:

7.1 (Management Accountability and Responsibility)

Clearly identified company representatives are responsible for ensuring implementation and periodic review of the status of the management systems.

7.2 (Legal and Customer Requirements)

Identification, monitoring and understanding of applicable laws, regulations and customer's requirements as necessary to each department.

7.3 (Training)

Training programs for managers and workers in order to implement company policies, procedures and improvement objectives, as well as developing the overall skills of the company, are implemented.

7.4 (Communication)

Processes for communicating clear and accurate information about company performance, practices and expectations to workers, suppliers and customers.

7.5 (Corrective Action Process)

Processes for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

7.6 (Documentation and Records)

Creation of documents and records ensure compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

8.0 (Ethics)

To meet social responsibilities and to achieve success in the marketplace, We aim to uphold the highest standards of ethics including:

8.1(Business Integrity)

The company has a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes).

All company dealings should be transparently performed and accurately reflected on business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

Gifts and Entertaining, of or by customers, is acceptable where there is no promise of, or inference of, business being offered or accepted on the basis of these activities alone.

8.2 (No Improper Advantage)

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

8.3 (Disclosure of Information)

Information regarding company activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices, or disclosing on company's internet for reference.

8.4 (Intellectual Property)

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

8.5 (Fair Business, Advertising and Competition)

Standards of fair business, advertising and competition are to be upheld. Means to safeguard customer information should be available.

8.6 (Protection of Identity)

Programs that ensure the protection of supplier and employee whistleblower confidentiality are to be maintained.

8.7 (Community Engagement)

The company participates in community activities in order to help the development of society and economy.

8.8 (Responsible Sourcing of Materials)

We exercise due diligence on the source and chain of our materials and make sure due diligence measures available to customers upon customer request. We are committed to ensuring all our Products, and the materials used, are compliant with the Conflict Free Mineral requirements and are not sourced from the Democratic Republic of Congo and adjoining countries.

8.9 (Privacy)

The company is committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers and employees. The Company complies with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Document Change History

Rev A – Issued for use	21/02/2013
Rev B – Reference to CFM & DRC clarified	08/08/2013