

# CSR

## Corporate Social Responsibility and Sustainability Policy

### Introduction

“**Riff Company, Inc.**” is a **Private** company committed to our corporate and social responsibility very seriously in accordance with the wider agenda and our government as we also implement elements defined the EICC code of conduct to in order to advance social and environmental responsibility within our firm.

We value the principles of accountability, honesty and integrity in all aspects of our business. Our policy is to conduct our business in a manner which ensures:

- Ethics in Business
- Fair Labor Practices
- Commitment to Health and Safety
- Environment Responsibility
- Maintenance of Corporate Management System
- Managing our business with complete integrity.

We will continually evaluate what we do in order to improve our CSR performance.

We recognize to succeed in delivering the best possible service all employees, suppliers, visitors, contractors and other stakeholders working at or on behalf of “**The Riff Company, Inc.**” share the responsibility at all times whilst carrying out their duties paying due regard to “**Riff Company, Inc.**” policies, procedures and practices.

### Our Values

Our stated values are as follows:

Honesty  
Respect  
Professionalism  
Passion

We shall endeavor to adhere to our values in all of our activities, and we shall strive to be an example of good practice. We shall encourage our stakeholders to adopt appropriate socially responsible policies and practices

### Ethics

**”Riff Company, Inc.”** actively promotes ethics in all of our dealings. We have a commitment to the following practices:

- 1) **Business Integrity** - Using highest standards of integrity in all business interactions. Corruption, extortion and embezzlement are strictly prohibited. These actions will result in immediate termination and legal actions.
- 2) **No Improper Advantage** - Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.
- 3) **Disclosure of Information** - Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.
- 4) **Intellectual Property** - Intellectual property rights will be respected; transfer of Technology and knowhow is to be done in a manner that protects intellectual property rights.
- 5) **Fair Business, Advertising and Competition** - Standards of fair business, advertising and competition will be upheld. Will safeguard customer information will best practice techniques.

## Labor

We value our workers. We are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the global community. Our principles include:

- 1) **Freely Chosen Employment** - Forced, bonded or indentured labor or involuntary prison labor 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.
- 2) **Child Labor Avoidance** - Child labor is not used in any stage of manufacturing. The term “child” refers to any person employed 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. The use of Workers under the age of 18 will not perform hazardous work and may be restricted from night work with consideration given to educational needs.
- 3) **Working Hours** - Workweeks will not exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers will have at least one day off per seven-day week.
- 4) **Wages and Benefits** - Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. The

basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation.

- 5) **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.
  
- 6) **Non-Discrimination** – Our company will be committed to a workforce free of harassment and unlawful discrimination. Companies shall 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. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.
  
- 7) **Freedom of Association** - Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. We respect the rights of workers to associate freely, join or not join labor unions, seek representation, join workers' councils in accordance with local laws. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

## Environment

### Introduction

“**Riff Company, Inc.**” understands that our activities affect the environment and the communities in which we operate. We take our responsibility seriously to identify and manage these impacts as effectively as possible. We are committed to continually improving our environmental performance and moving towards best practices in corporate sustainability.

#### 1) **Environmental Permits and Reporting**

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

#### 2) **Pollution Prevention and Resource Reduction**

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

#### 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.

#### 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.

#### **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) Product Content Restrictions**

When applicable we adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances including labeling laws and regulations for recycling and disposal. Participants are also to adhere to processes to comply with each agreed-upon customer-specific restricted and hazardous

## **Health & Safety**

Participants recognize that the quality of products and services, consistency of production, and workers' morale, are enhanced by a safe and healthy work environment. Participants also recognize that ongoing worker input and education is key 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.

The health and safety standards are:

#### **1) Occupational Safety**

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicle, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout). Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate personal protective equipment. Workers shall not be disciplined for raising safety concerns.

#### **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.

#### **3) Occupational Injury and Illness**

Procedures and systems are to be in place to manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and d) facilitate return of workers to work.

#### **4) Industrial Hygiene**

Worker 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) Physically Demanding Work**

Worker exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing and highly repetitive or forceful

assembly tasks is to be identified, evaluated and controlled.

**6) Machine Safeguarding**

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

**7) Dormitory and Canteen**

Workers are to be provided with clean toilet facilities, access to potable water and sanitary food preparation and storage facilities. Worker dormitories provided by the Participant or a labor agent are to be clean, safe, and provide emergency egress,

## Management System

Participants shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to the Participant's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system elements are comprised of the items below:

**1) Company Commitment**

We commit to a corporate social and environmental responsibility to compliance and continual improvement.

**2) Management Accountability and Responsibility**

We are responsible for ensuring implementation and periodic review of the status of the management systems.

**3) Legal and Customer Requirements**

Our company will monitor and understand applicable laws, regulations and customer requirements.

**4) Risk Assessment and Risk Management**

We have examined our business and identified the environmental, health and safety, and labor practice risks associated with our operations. We have implementation of appropriate procedural and physical controls to ensure regulatory compliance to control the identified risks.

**5) Performance Objectives with Implementation Plan and Measures**

We have noted standards, performance objectives, targets and implementation plans including a periodic assessment of our performance against those objectives.

**6) Training**

Our program contains training for managers and workers to implement the procedures and improvement objectives.

**7) Communication**

We communicate clear and accurate information about our performance, practices and expectations to workers, suppliers and our customer.

**8) Worker Feedback and Participation**

Feedback sessions are held for employees' understanding on practices and conditions covered by this Code and to foster continuous improvement.

**9) Audits and Assessments**

Periodic self-evaluations are conducted to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

**10) Corrective Action Process**

Process for timely correction of deficiencies identified by internal inspections, investigations and reviews.

**11) Documentation and Records**

Our company will create and/or maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

Dan McCormick,  
President  
Riff Company, Inc.  
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