



SOCIAL, ETHICAL AND ENVIRONMENTAL CODE OF CONDUCT

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Introduction:

MAPED, leading international designer and manufacturer of school, writing and office supplies, considers Sustainable Development to be an important element of its strategy.

The company's fundamental values of respect, integrity, creativity, adaptability and civic responsibility are reflected in a number of long-term environmental, economic and social projects.

As a leading international player, MAPED is aware of its responsibilities, its duty of care and due diligence. MAPED has therefore adopted a structured, proactive approach to ethical, environmental and social responsibility, which is formalized in this Code of Conduct.

Objectives:

The main objective of this Code of Conduct is to promote ethical business practices based on partnership relationship. MAPED favors a continuous improvement and development approach within its professional sphere of influence.

By asking its partners to comply with the principles of this Code of Conduct and to implement them within their own organization, MAPED intends to promote working conditions that are respectful of human rights, social progress and the environment throughout its international supply and distribution chain.

This Code of Conduct stipulates minimum requirements. They must not be interpreted as maximum limits nor be used against employees, particularly with the aim of restricting their freedom of association or their right to collective bargaining.

References:

This Code of Conduct is based on the fundamental principles defined in several original texts (see Annex): the Universal Declaration of Human Rights, the fundamental conventions and recommendations of the International Labor Organization (ILO), the guiding principles on business and human rights (UN), the Organization of Economic Cooperation and Development (OECD) guidelines for multinational enterprises, the principles of the United Nation's Global Compact.

Furthermore, MAPED complies with the requirements of international and European standards:

- ISO 14001 for environmental management. Certification obtained by MAPED 19/05/2010
- OHSAS 18001 for occupational health and safety. Certification obtained by MAPED 28/05/2013
- SA 8000 for working conditions
- REACH for the management of chemicals contained in products

Basic commitments and principles:

MAPED complies with the following basic principles and asks its business partners to do the same:

1. **Promotion and development of management systems:**
To comply with MAPED's Code of Conduct, business partners must implement and deploy appropriate management systems, formalized by written procedures and training. A member of the management team should be given responsibility for social, ethical and environmental issues.
2. **Free choice to work and no forced labor:**
MAPED rejects any form of modern slavery. Every employee must be free to choose to work without being threatened with penalties, fines or any other sanction by his/her employer. Employees must be free to leave their workstation at the end of each shift, and to terminate their employment subject to due notice.
Forced prison labor is prohibited. The same conditions should be applied indifferently to both migrant and local workers.
3. **No inhumane or harsh treatment:**
No employee should be subjected to degrading or humiliating treatment, suffer physical punishment, threats or any other form of psychological or sexual harassment.
4. **No child labor; compliance with regulations for the employment of young workers:**
MAPED forbids the direct or indirect employment of children under fifteen or below the country's compulsory education age if this is over 15, except in cases expressly authorized by the ILO (International Labor Organization). An effective procedure must be implemented by each company to check the age of applicants upon recruitment.
If the company already employs children, a support program must be set up to organize their departure from the workplace under the best possible circumstances, by endeavoring to find a solution in the best interests of the child and his/her family, for example by contributing to the child's education or trying to replace the child with an adult member of the same family.

Young workers (between the minimum legal age and 18 years) may not be employed in a job that endangers their health, safety, morality, or physical and intellectual development. Their working hours must be compatible with school attendance or participation in apprenticeship programs.
5. **No discrimination:**
Discrimination on the basis of race, religion, ethnicity, caste, origin, age, gender, handicap, sexual orientation, membership in a trade union or political organization is prohibited when recruiting or deciding remuneration, access to training, promotion and dismissal. Any harassment, psychological or physical violence in relation to any of the above is strictly prohibited.

6. Freedom of association and protection of the right to collective bargaining:
MAPED respects and promotes the internationally recognized right to freedom of association and to collective bargaining, in its own company and throughout its supply chain. All workers have the right to join the trade union of their choice, to create their own union and to participate in collective bargaining freely and independently without suffering any discrimination or intimidation. If national legislation restricts these fundamental liberties, the employer must promote social dialogue and workers' representation in other ways, for example by creating workers' committees or associations, freely elected by its employees.
7. Working conditions complying with occupational health and safety regulations:
Health and safety conditions must be implemented to ensure a safe and healthy environment for employees, with particular attention to the most vulnerable, such as young workers, pregnant women and disabled workers. Compliance with national occupational health and safety regulations, or international standards if no such regulations exist, is a strict minimum. The occupational health and safety risks to which workers are exposed due to their job, the industrial activity or the duration of their work must be assessed.

Effective procedures must be implemented to avoid occupational accidents, injuries and illnesses: employee awareness must be developed via training and exercises concerning the use of personal protective equipment (PPE); workstations must be organized according to the principles of ergonomics; the safety of buildings, machines and electrical equipment must be inspected regularly; fire-fighting equipment adapted to the factories' needs must be provided; evacuation and fire-fighting exercises must be organized, etc.

A Health and Safety Manager must be appointed from the management team and a Health and Safety committee shall meet regularly to deal with these matters.

The employer should guarantee medical assistance and access to emergency care, as well as access to drinking water and safe, clean areas for eating and break times.

Any areas used by employees must comply with requirements regarding space, ventilation, temperature, light and noise.

The employer guarantees the employee's right to leave the workplace in the case of imminent danger to his/her physical integrity or life.

8. Fair remuneration and social benefits:
MAPED and its business partners acknowledge that their employees should receive fair pay that affords them a decent lifestyle, ensuring the health and well-being of themselves and their families. Their salary should cover food, clothing, accommodation, education, medical care and the necessary social services.
To achieve this objective, MAPED invites its business partners to consult the employees' representatives in order to consider all possible solutions.

In any event, all employees, including piece rate workers, should be paid at least the minimum legal wage (national or local) for the legal duration of work,

or according to industry standards approved by collective conventions if these are more favorable to the employee.

Every employee should also receive all legal social benefits (paid annual leave, exceptional leave, maternity leave, seniority bonuses, mandatory social welfare, etc.)

Wages must be paid regularly and on time. Employees shall be provided with detailed and comprehensible written information on the elements of their salary. No deductions are allowed unless provided for by law or by a collective bargaining agreement.

The calculation and payment of overtime at premium rates must comply with legal provisions.

9. Reasonable working hours:

Working hours must comply with national regulations and not exceed 48 hours per week (excluding overtime), except for specific ILO exceptions.

Overtime should remain occasional and accepted voluntarily by the employee. Overtime may not exceed 12 hours per week.

All workers must be permitted breaks during the working day and one day off after any period of 6 consecutive working days, unless otherwise specified in a collective bargaining agreement or a special authorization from the competent authority.

10. No precarious employment – No disguised subcontracting:

Employment should be provided according to a formal working relationship, based on national laws and practices and described in either a letter of employment or an employment contract which detail the worker's rights, obligations and employment conditions: status, hours, wage, terms and conditions of payment, etc.

The employer undertakes to favor regular working relationship and to respect the spirit of national employment laws by avoiding the abusive use of temporary, seasonal or apprentice contracts.

Disguised subcontracting is prohibited by this Code of Conduct.

Any partial or complete transfer of the manufacture of goods subject of an agreement between supplier and client must first be authorized by MAPED; such authorization may be granted on a case by case basis. The terms of authorized subcontracting and home-working must be formalized by a management system and written procedures.

11. Protection of the environment:

MAPED's strong commitment to minimizing the impacts of its activity on the environment is reflected in the ISO 14001 certification of its production sites and the eco-design of its products. MAPED demands that its suppliers also adopt a proactive environmental strategy.

Suppliers must comply with applicable national laws and regulations for the protection of the environment as a strict minimum. An impact study and risk assessment must be carried out, and the appropriate management system implemented. Any necessary authorizations and permits must be obtained for the use of water, gas and electricity supplies, waste processing, the management of hazardous substances, and the emission of aqueous and atmospheric waste.

12. Business ethics – no corruption or counterfeiting:

MAPED and its business partners undertake to ensure strict compliance with the laws applicable in their countries of operation, and the legal requirements and standards applicable to their industry.

They undertake to conduct their business according to ethical principles, rejecting any participation in acts of corruption, extortion, bribery or other fraudulent practices.

The counterfeiting of patents, models, drawings, brands and any infringement of other intellectual property rights are strictly prohibited.

Implementation and monitoring:

The business partners undertake to inform their employees of the provisions of this Code of Conduct.

They will take all reasonable measures to ensure the communication and application of the provisions of this Code of Conduct to their subcontractors, suppliers and subsidiaries.

This Code of Conduct forms an integral part of the contracts between MAPED and its business partners.

To ensure respect of this Code of Conduct, MAPED intends to conduct social, environmental and safety audits in its factories and those of its supplier partners. For this purpose, the supplier guarantees that the auditors appointed by MAPED shall have full access to its production sites (manufacturing workshops, canteens, dormitories) as well as to documents and employees interviews.

In order to improve compliance with this Code of Conduct, the supplier undertakes to implement any corrective measures deemed necessary by the audit within the agreed time frame.

As part of its continuous development initiative, MAPED may, if necessary, assist its business partners with the implementation of their corrective measures.

MAPED reserves the right to suspend or permanently terminate any commercial relations with a business partner in breach of the provisions in this Code of Conduct and failing to seek improvement solutions in good faith, or failing to ensure transparency in its practices.

Annex: References

- Universal Declaration of Human Rights, (UN, 1948)
- The International Labour Organization's (ILO) fundamental Conventions
 - C087 Freedom of Association and Protection of the Right to Organise Convention, 1948
 - C098 Right to Organise and Collective Bargaining Convention, 1949
 - C029 Forced Labour Convention, 1930
 - C105 Abolition of Forced Labour Convention, 1957
 - C138 Minimum Age Convention, 1973
 - C182 Worst Forms of Child Labour Convention, 1999
 - C100 Equal Remuneration Convention, 1951
 - C111 Discrimination (Employment and Occupation) Convention, 1958
- Other ILO conventions:
 - C155 Occupational Safety and Health, 1981
 - C097 Migration for Employment Convention, 1949
 - C095 Protection of Wages Convention, 1949
- Guiding Principles for Business and Human Rights, (UN, 2011)
- Global Compact (UN, 2000)
- OECD Guidelines for multinational enterprises (OECD, 2011)