

Corporate Social Responsibility
by Imhotep Promotions B.V.

PREFACE

Preface

Imhotep Promotions BV aims at professional and corporate social responsibility and is therefore accountable for guaranteeing this pursuit.

Imhotep Promotions BV has the ambition to be the first choice of customers, suppliers and employees. The code of conduct indicates who we are and how we work by setting down the core values, which should be at the basis of the behaviour of Imhotep Promotions BV. The conditions which have been laid

down in the code of conduct, are based on our norms and values and apply to all acts of our company, wherever in the world, and to the individual conduct of our employees while carrying out the company activities of Imhotep Promotions BV.

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CORPORATE SOCIAL RESPONSIBILITY

1. Corporate Social Responsibility .

Corporate Social Responsibility (CSR) is about making a conscious choice in order to reach a balance between People, Planet and Profit.

What is CSR?

Corporate Social Responsibility (CSR) is the standard for entrepreneurial activity in the 21st century.

The vision broadens the focus of the entrepreneurship. Value should not only be added in the economic area (Profit), but also ecologically (Planet) and socially (People).

Why CSR?

There are different reasons to choose for CSR, amongst which:

- it is an instrument which ensures an easier anticipation on a changed environment;
- it leads to cost savings (such as energy costs or sickness absence);

- it increases productivity;
- it is an answer to the demand for sustainability, also amongst companies;
- it is necessary in the long term (scarcity of raw materials).

CSR by Imhotep Promotions.

Imhotep Promotions finds it no less than normal to make her contribution to a durable society by not only considering the financial picture when making decisions, but also the society and the environment.

The first step towards Corporate Social Responsibility has been taken by drawing up this dynamic document.

INTEGRITY

2. Integrity

Imhotep Promototions BV must have a reputation of reliability. Our integrity should be beyond doubt. It is necessary that everyone who works with or for us, complies with the legal and regulatory framework of the countries where we operate. We expect our employees to deal incorruptably with each other, with customers and with third parties. Also our partners must have integrity and be reliable in business.

Privacy.

We respect the privacy of our customers and employees and will protect their personal data.

With business dealings, one can gather information about clients, suppliers, competitors and others. We treat these data confidentially and will only use these for acceptable company purposes.

Administration.

The management must ensure that all relevant transactions and other activities are recorded correctly, accurately and truthfully in the administration.

Theft and fraud.

It is Imhotep Promotions' policy to immediately investigate cases of internal and external theft, which involve Imhotep Promotions, to report these, and as the case may be, to take legal action.

Gifts / invitations.

The general principle is that employees of Imhotep Promotions are not allowed to accept or offer gifts with a value of over €100,- and/or work related gifts.

There are cases where refusing a gift, may embarrass or hurt the person who offers it. In these cases the gift may be accepted in consultation with the superior or the management.

Invitations for trips or events can only be accepted with the permission of the superior or the management.

We expect our suppliers and other business partners to refrain from offering gifts to our employees with the purpose to influence them.

Under no circumstances will it be permitted to offer or to accept bribes.

Conflicts of interest.

We are dependent on the trust of our customers, suppliers and other third parties. Conflicts of interest or the appearance thereof, undermine the good reputation of Imhotep Promotions.

A conflict of interest arises in a situation in which the contacts or the position of an employee within the company, are used for serving personal, business or financial interests, to the detriment of the company, or otherwise.

Every situation in which a conflict (or the appearance of a conflict) could possibly arise between private interests and those of Imhotep Promotions, must be avoided.

FINANCES

3. Finances.

Also regarding finances Imhotep Promotions stands for sustainability and takes her responsibilities. To do something in return for society is taken for granted.

Sustainable bank.

Imhotep Promotions BV opts for banks, which also operate in a sustainable and responsible way, and therefore also take their responsibilities concerning the society and the environment.

Charity and sponsoring.

Imhotep Promotions finds it important to support good causes and to sponsor local initiatives.

Year Report.

Imhotep Promotions charges an accountant each year to draw up a year report for the advancement of the transparency.

WORKING CONDITIONS AND OPERATING ENVIRONMENT

4. Working conditions and operating environment

Imhotep Promotions BV considers the creation of an attractive, safe, and healthy working atmosphere for her employees her responsibility.

Compliance with the applicable law and regulations

Compliance with all applicable national laws and regulations, all norms which apply within the industry as a minimum, the ILO and UN Conventions and all other relevant legal requirements, whereby the most stringent regulations will be adhered to.

Discrimination.

Our employees are selected on the basis of objective and non-discriminating criteria. Not any intimidation or discrimination, e.g. because of race, skin colour, gender or religion, will be permitted, in accordance with ILO Conventions 100, 111 and 143.

The above also means that we will only do business with partners who endorse this.

Intimidation and harassment.

Forms of intimidation and harassment are intolerable. Managers must be attentive to possible cases of intimidation or harassment and must report such a situation immediately to the management and end this situation as soon as possible.

Complaints can be submitted to the superior or the management. As a result of a complaint, an investigation will be done by Imhotep Promotions and if necessary appropriate measures will be taken.

Medical file employee.

A handicap or chronic sickness is no reason to end the employment contract with an employee. Under all circumstances employees must be enabled to remain employed, in as far as they are able to meet the requirements of available and suitable work.

It is not allowed to ask applicants or employees about their personal medical data other than data which are necessary for determining whether they are suitable for the job. All personal medical data will be treated as confidential.

Imhotep Promotions will by means of the Health and Safety Executive do everything to prevent sickness absence among her employees as much as possible. So as by consulting with the Executive and yearly checks of the workplaces.

Smoking, drugs and alcohol consumption.

Imhotep Promotions maintains a non-smoking policy. Only in the designated smoking area and in the employees' own time, are they permitted to smoke.

We expect our employees to always behave properly. Usage of alcohol and drugs immediately before or during working hours, is strictly forbidden.

Health at work.

For the advancement of the employees' health, Imhotep Promotions sees it as her duty to provide good ventilation and lighting, clean toilets and sufficient access to drinking water. In addition, furniture tested by the Health and Safety Executive will be made available to the employees.

Imhotep Promotions promotes sports among her employees.

Remuneration.

All employees of our company receive salary for the carried out activities. The salary is in accordance with the market, complies with the legal requirements and is periodically tested externally.

Illegal or illicit withholdings on salaries and wages are not permitted.

The above also means that we only want to do business with partners who endorse this, in accordance with the ILO conventions 26 and 131.

Working hours.

The average maximum number of permitted working hours within one week, amounts to 48 hours per 16 weeks. An employee is entitled to at least one day off after having worked 6 consecutive days.

Overtime is avoided as much as possible, but is compulsory for the employee if the company interest – in Imhotep Promotions' Gifts' opinion - requires it. With regard to the stipulations by, or on behalf of the legislation on working conditions.

In principle, the employee will always be compensated for overtime.

Imhotep Promotions BV keeps to the national rules concerning working days and holidays. This is in accordance with the ILO Conventions 1 and 14.

Training possibilities.

Imhotep Promotions appreciates employees increasing their professional knowledge and/or ability through study. In order to stimulate this, in principle a compensation is provided within the framework of this study costs compensation scheme, for every study which is sufficiently in the company's interest.

Freedom of association.

Employees are entitled to associate and to negotiate collectively. They are also allowed to join a labour union.

In situations of countries where this right is restricted by legislation, equal possibilities and support have to be offered for independent and free organisation and negotiation. This in accordance with the ILO conventions 87, 98 and 135.

The above also means that only want to do business with partners who endorse this.

Safety at work.

Imhotep Promotions will do everything possible for all employees to prevent accidents at work, in accordance with the Dutch Occupational Health and Safety Act, ILO conventions 155 and recommendation 164. See also paragraph 6.

Prohibition on child labour.

Child labour refers to the sort of work, and its intensity, which hinders with their access to education, damages their physical and/or psychological health and their development within their family, and robs them of their childhood or their self respect.

Child labour is forbidden, as has been indicated in the ILO and UN conventions and/or nationally applicable laws and rules. Imhotep Promotions BV forbids any form of child labour in accordance with ILO Conventions 79, 138, 142 and 182 and SA8000.

The above also means that we only want to do business with partners who endorse this.

Prohibition on forced labour.

All forms of forced labour are forbidden.

The same goes for labour by prisoners, whereby the fundamental human rights are violated. Imhotep Promotions BV will only employ people who choose to do the work voluntarily.

Imhotep Promotions BV will under no circumstance make use of forced labour in accordance with ILO Conventions 29 and 105 and SA8000.

The above also means that we only want to do business with partners who endorse this.

SOCIETY, ENVIRONMENT AND SAFETY

5. Society, environment and safety.

Imhotep Promotions B.V. is at the centre of society and we seek to do business in a corporate responsible way.

Imhotep Promotions BV protects the environment by ensuring that it is not harmed, or as little as possible, by her activities.

Working conditions at suppliers.

All suppliers sign the purchasing conditions. With these they promise to comply with all legislation concerning the working conditions of their employees.

Imhotep Promotions will ensure that all suppliers if need be will be tested concerning the working conditions. See also paragraph 5.

Transport.

Imhotep Promotions considers it her duty to drive back the impact on the environment as a consequence of transport. Moreover, public transport is promoted.

In addition, our employees will only be allowed to choose a company car with the A/B energy label.

Imhotep Promotions BV chooses preferably transport partners who also take responsibility concerning the environment.

Energy saving.

Imhotep Promotions strives for continuous energy saving. We have taken measures which minimize the energy usage, like amongst others the usage of a sustainable energy supplier; 100% insulation and double glazing.

Waste control.

Imhotep Promotions will make a contribution towards driving back the amount of packaging and separating the industrial waste. To this end we have already taken several measures, such as:

- providing facilities to separate waste and collecting it separately;
- making use of bulk instead of individual packaging where possible;
- reuse of packaging;
- driving back the number of prints per year;
- pointing out to our customers to only print e-mails if this is really necessary;

Water use.

We find it important to keep the water usage within our company as low as possible. In order to realise this, Imhotep Promotions has amongst other things a flush stop on all toilets in the building.

Environmentally friendly products.

In order to spare the environment as much as possible, Imhotep Promotions favours the use of environmentally friendly products. Amongst other things, we only make use of cleaning agents without bleach, refillable bottles and environmentally friendly toilet paper. In addition, all our catalogues and leaflets are also available digitally or on environmentally friendly paper.

Fire prevention.

Providing a safe working environment is Imhotep Promotions' responsibility.

Nevertheless, accidents may happen.

For the protection of our employees in case of fire, several smoke alarms have been installed in the building. Moreover, there are fire extinguishers, alarm bells and fire hose reels.

In addition, the building has several emergency exits, which have been indicated clearly, and also there is a fire emergency plan.

First aid.

We do everything to prevent accidents. However, one can never exclude them. Imhotep Promotions offers sufficient medical facilities and access to first aid necessities. Moreover, in case of injury, which requires professional treatment, a staff member with a 'BHV' certificate (*~'First Aid' certificate*) can be contacted.

Legal and regulatory framework concerning product safety

Imhotep Promotions' policy is to comply with all laws and rules, applicable to product safety.

Amongst these are at any rate, the following laws and rules:

- AZO
- Cadmium
- CE
- EN471
- EN71
- REACH
- RoHS
- WEEE

In the appendix you find an explanation of the mentioned legal and regulatory framework.

Imhotep Promotions BV has the ambition to only do business with suppliers, who comply with the applicable laws and rules.

CAPITAL EQUIPMENT AND INFORMATION

6. Capital equipment and information.

Imhotep Promotions provides employees capital equipment and information. We expect them to use these properly.

Financial resources of the company.

Employees are responsible for the proper use, the protection and preserving of the financial resources of the company. These resources comprise among other things, cash money, credit cards, bills and receipts. It is essential to protect these against abuse, loss or theft. All claims, receipts, bills and invoices must be correct and complete.

Computer abuse, internet and e-mail.

A properly functioning computer technology and infrastructure is of crucial importance for our business success.

Therefore, every employee who makes use of a computer, as well as the network, has the task to use these facilities in a responsible fashion for the purpose for which they are meant. Personal (non business) use must be reasonable and be kept to a minimum.

Confidentiality.

It is every employee's duty to handle confidential data carefully. Employees, who deal with confidential information, are bound by a pledge of secrecy.

Improper publication of this sort of information may damage Imhotep Promotions and therefore, may result in disciplinary measures.

COMPLIANCE

7. Compliance

Employees.

In this industry the employees' quality and dedication, as well as attention for the customer, are key factors in the operational management.

Due to this, the employees act in an honourable way and are also themselves equally treated. This implies they have to be aware of the Code of Conduct, and that they have to act accordingly in good conscience. If people do not comply with these properly, they do not only harm themselves, but also their colleagues and Imhotep Promotions as a whole. Violation of this Code of Conduct can result in disciplinary measures.

Partners and suppliers.

We expect our partners and suppliers to observe the basic principles of this Code of Conduct. If we establish that actions are taken in violation of this Code of Conduct, we reserve the right to end the commercial relationship.

*Imhotep Promotions BV assumes her
partners observe an equal code.*

Appendix 2 Legal and regulatory framework

The products in the Imhotep Promotions assortment must on all fronts meet the applicable laws and rules. Below a summary thereof is presented.

1. Azo

Azo are dyes, which through direct contact with the skin, can be harmful to the general health. Therefore, in the 'Warenwetbesluit Azo kleurstoffen 1998' (~'Commodities Act Azo dyes 1998'), it has been stipulated, that it is forbidden to process Azo dyes in textile and leather products, unless they are present as pigment.

2. Cadmium

Cadmium is a metal which is primarily mined as by-product from zinc ore. Just like lead and zinc, it belongs to the group heavy metals, which already in small quantities can be harmful to the environment and people's health.

The Cadmium decree 1999 forbids the use of cadmium as pigment, dye, stabiliser and surface layer. Furthermore, the decree forbids the production, import, trading and keeping stock of among other things products, in which pigment, dye or stabiliser has been used, and of which the cadmium content is higher than 100 milligrams per kilo, and of products with a cadmium containing surface layer, in which a substance or paint has been used with a cadmium content of more than 100 milligrams per kilo.

3. CE certification

The CE marking indicates that the product meets the applicable rules within the European Economic Area. Here CE means 'Conformité Européenne' (=European Conformity), which actually means that it is in accordance with the European rules.

The CE marking is a legally obligatory indication on products which fall under one of the "New Approach" guidelines. They are for example electrical devices, machines, toys, elevators, measuring instruments (water, gas and electricity meters, scales etc.) and personal protective means (safety helmets, signalisation clothing and the like)[2]. By affixing the CE marking, the producer or importer indicates that he has drawn up a conformity declaration for the product concerned. In this conformity declaration the producer or importer is obliged to indicate that the product meets all applicable European guidelines. Besides, the producer or importer commits himself to be liable for his product.

4. EN 471

EN471 is a norm which determines the requirements, which are made concerning protective clothing with the aim to visually indicate the presence of the wearer, both in daylight, and with lighting by cars' headlights. These requirements concern the materials used, the design, their colour and their reflection grade.

5. EN 71

EN71 contains detailed safety instructions for toys (sets). For example requirements have been made concerning the mechanical and physical qualities, the flammability, the migration of certain elements and the protection of children under three years of age.

6. REACH

Reach stands for 'Registration, evaluation, authorization and restriction of chemicals' and is an ordinance which replaces more than sixty existing ordinances and guidelines. Each product which has been made by means of chemicals, or which contains some chemicals, is part of Reach

The essence of Reach is that in principle, of all substances a company produces, processes or passes on to customers, it must know the risks, and name measures to control these risks. As a consequence importers (the ones who first bring an article/product on the European market), must be informed about all individual substances in the products and indicate some of them in reaching the 1% of the total weight per product, and when importing more than 1000 kilos.

7. RoHS

RoHS stands for 'Restriction of Hazardous Substances' and is a guideline for limiting the application of certain hazardous substances in electrical and electronic equipment. The EU Guideline imposes restraints on the usage of 6 hazardous substances in the production of such equipment.

8. WEEE

WEEE stands for 'Waste from Electrical and Electronic Equipment' and is a regulation concerning collection, processing, recycling and removal of electrical and electronic equipment. The producer must produce the article in such a way, that the environment is suffering the least amount of damage.

On every electrical and/or electronic device the production date must be traceable. Besides, the *wheelly* must also be visible.