

# IDA

# Code of Conduct

*Summary of the IDA policy regulations regarding professional behaviour*

**Applicable to Manufacturers and Suppliers**

**Version 2.0**

**19 February 2013**

Abstract of relevant parts for manufacturers and suppliers of IDA's full code of conduct version 2.0 of 5 February 2013.

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# 1 Introduction

This Code of Conduct has been constructed to ensure that our standards and values are clear towards all parties we cooperate with, and that we can count on them to be well-informed and uphold these standards. We expect our suppliers and manufacturers to comply with national and international law, and to the standards communicated in this Code that are applicable to work that they conduct for IDA.

Before going into business with manufacturers or suppliers we expect them to have read this Code of Conduct and signed off on it, agreeing that they will uphold the standards we have set. If it is clear that one of these parties is violating the Code and is not willing or able to meet our standards we will refrain from doing business with this player, or discontinue business with this player.

## 2 Our People

### 2.1 Human rights

IDA supports and respects the protection of internationally proclaimed human rights, and ensures that it is not complicit in human rights abuses, neither directly or indirectly via its suppliers, manufacturers and stakeholders.

#### 2.1.1 *Equal employment opportunities*

People must be selected and promoted on the basis of their qualifications and merit, without discrimination or concern for race, religion, social or ethnic origin, colour, sex, sexual orientation, gender identity or expression, age, health condition, marital status, political orientation or disability.

#### 2.1.2 *Child Labour*

IDA does not accept participation in any form of child labour as defined by the International Labour Organisation (ILO), and expects the same from our suppliers, manufacturers and stakeholders. The minimum admission to employment shall not be less than the age of completion of compulsory schooling, normally not less than 15 years or 14 depending on local law. Additionally, all young workers must be protected from performing any hazardous work, work that interferes with the child's education or work that harms the child's health or development.

#### 2.1.3 *Forced Labour*

IDA prohibits the use of forced or involuntary labour as defined in the ILO conventions, and expects this from our suppliers, manufacturers and stakeholders. All work, including overtime work, must be voluntary and workers are free to leave upon reasonable notice. It is not permitted to demand workers to hand over government-issued identification (passports or work permits) as a condition of employment.

#### 2.1.4 *Discrimination*

We believe that a workplace should be safe and civilized. We will not tolerate discrimination or offensive behaviour of any kind, which includes the persistent demeaning of individuals through words or actions, or the display or distribution of offensive material. All employees must be treated, and treat one another, with respect, regardless of their race, religion, social or ethnic origin, colour, sex, sexual orientation, gender identity or expression, age, health condition, marital status, political orientation or disability.

### **2.1.5 Health, safety and welfare**

We expect all suppliers to follow the relevant national legislation and regulations of the countries in which they are operating to ensure a safe and healthy workplace at all times. Suppliers and manufacturers must at least strive to implement recognised systems and guidelines on occupational safety and health, such as those created by the ILO. At a minimum suppliers and manufacturers have to be able to guarantee reasonable access to potable water and sanitary facilities, fire safety, emergency preparedness and response, industrial hygiene, adequate lighting and ventilation, occupational injury and illness and machine safeguarding.

## **2.2 Anti-corruption: gifts, payments, bribery and fraud**

Correct business decisions and sound business relationships must be based on objective criteria. Misleading others, and offering or receiving inappropriate gifts or non-permitted payments clouds this objectivity, influences business relationships and may be illegal. Below are definitions, formulated by the Global Fund, of the practices that we refer to.

*“**Corrupt practice** means the offering, promising, giving, receiving, or soliciting, directly or indirectly, anything of value or any other advantage to influence improperly the actions of another person or entity.”*

*“**Fraudulent practice** means any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a person or entity to obtain a financial or other benefit or to avoid an obligation.”*

Corrupt and fraudulent practice will not be tolerated by IDA Foundation under any circumstances.

### **2.2.1 The acceptance of gifts and benefits**

Specifically, IDA Foundation's policy forbids the acceptance of gifts, favours, entertainment or services that have more than a modest value (30 EUR in the Netherlands and 2165 INR in India) from anyone with whom you are doing business for the company. This may include suppliers, customers, freight forwarders, accountancy agencies and all other business partners. Even modest gifts must not be accepted if they can be deemed questionable where you are doing business.

Payment of Business lunches are permitted if it is customary to do this and the costs thereof are reasonable.

### **2.2.2 Payments or gifts to public sector representatives**

Gifts, payments or services to any public sector official, employee or agent will not be tolerated and are illegal under (US and other) anti-corruption law. This applies even in countries in which bribes or gifts to public sector officers are customary. No unlawful payments may be made, even if 'non-payment' can result in a competitive disadvantage for IDA.

## **2.3 Conflict of interest**

A conflict of interest is a situation in which a party has interests that could improperly influence that party's performance of official duties or responsibilities, contractual obligations, or compliance with applicable laws and regulations, and that such conflict of interest may contribute to or constitute a prohibited practice under this Code of Conduct.

IDA will not tolerate such interferences in sound business practices. IDA employees are not permitted to have any personal or family conflicts of interest within our business relations, with our suppliers or other third parties with whom we do business.

## 2.4 Anti-competitive behaviour

IDA prohibits making agreements with our competitors to influence prices, general sales standards or jeopardize fair competition. We will not accept collusive or anti-competitive practices, both defined (based on the Global Fund guidelines) below.

***“Collusive practice means an arrangement between two or more persons or entities designed to achieve an improper purpose, including influencing improperly the actions of another person or entity.”***

***“Anti-competitive practice means any agreement, decision or practice which has as its object or effect the restriction or distortion of competition in any market.”***

More specifically, IDA forbids:

- Communication with competitors regarding prices, costs or general sales standards
- Communication with suppliers or customers in which trade is restricted in an unfair manner or where certain competitors are pushed out of the market
- Agreements with competitors with regard to appointing certain markets or customers
- Agreements with other parties to boycott customers or suppliers

## 3 The Organisation

### 3.1 Environment

#### 3.1.1 *Manufacturers and Suppliers*

IDA manufacturers and suppliers must adhere to national and international law, and show respect for the environment. They shall, whenever possible, produce the products in such a way so that the environment, air, water or soil will not be polluted due to the production and disposal of waste. In case chemical and/or toxic waste or remaining scrap is created as a result of the production process, the supplier shall take all possible measures to rework or dispose this waste and/or remaining substance, as such that the direct or indirect environment is minimally influenced.

In all circumstances the suppliers to IDA shall follow the local government regulations, as well as the international acceptable standards for reduction of environmental pollution.