

## **FSI CODE OF CONDUCT AND ETHICS COMPLIANCE STRUCTURE AND PROCESSES**

**FSI REQUIRES EVERY INDIVIDUAL IN THE BUSINESS TO EMBRACE THE PURPOSE OF FSI AND TO UPHOLD OUR VISION, VALUES AND CODE OF CONDUCT.**

Our code of conduct covers all relevant areas that Directors, employees and partners are likely to face with a specific focus on our core principles of ensuring the personnel we recruit and employ are treated with the highest standards of care and respect. As such we base this element of our code of conduct on the Dhaka Principles and ILO Convention 181. The Dhaka Principles with additional comments on the FSI code of conduct are at Annex A.

FSI takes the adherence to the code of conduct extremely seriously and as such the CEO is the Chief Ethics & Compliance Officer.

FSI operates a confidential Ethics Help Line which is the CEO's personal number. Please use this resource whenever you have a question or concern that cannot be readily addressed within your work group or through your manager.

If your concern relates to the actions or decisions of the CEO, Chief Ethics & Compliance Officer, then please contact Esther Daines, the Company Lawyer.

### **OUR PRINCIPLES**

Our success depends on maintaining a culture of integrity. FSI is committed to dealing honestly and fairly with our employees, customers, suppliers, shareholders and the communities in which we live and work.

#### ***FSI - BUILT ON INTEGRITY & EXCELLENCE***

### **ETHICS PROCESS OVERVIEW**

How does Ethics relate to business conduct at FSI?

At FSI, we aspire to do more than comply with applicable laws and regulations. We strive to do what is right. As Martin Luther King 1929-1968, American leader of the civil rights movement and Nobel Peace Prize winner said:

*"The time is always right to do what is right"*

Our commitment to Ethics is articulated in Corporate Vision and Values:

**VISION:**

Unlocking Human Potential, Enabling Success

**PROMISE:**

Our promise is to deliver unwavering high standards and integrity

**VALUES**

**1. RESPECT**

We respect the time and cost constraints that our clients face, and therefore seek a collaborative approach in defining the best possible solution at optimal cost.

We respect the values, culture and ambitions of the teams we provide for clients, providing the highest standards of workforce management, compliant with some of the most stringent procurement processes of the US and UK governments.

We respect the need to provide respectable wages and fair working conditions as an essential minimum for any employment through our migrant labour services.

We respect and honour the need for our own employees to develop and grow within the organisation. We hold ourselves accountable for the highest standards of resource management.

**2. QUALITY**

We recognize that quality and value for money are often the most important buying factors for our clients.

We instil rigorous quality management procedures in the teams we provide to our clients. Our uncompromising belief in doing our work to the highest possible standards, remains consistent with our heritage.

Our employees always seek out the most efficient way of providing quality in our services and internal processes.

**3. INTEGRITY**

We are honest and transparent with clients, as we believe this is the best way to build relationships.

We are dedicated to ensuring all sources of exploitation are removed from every step of the value chain in our migrant labour solutions.

The teams we provide clients pride themselves on honesty and fairness in project planning and execution.

Our employees are held to the highest standards of honesty, ethics and openness in dealing with stakeholders.

#### 4. COLLABORATION

We insist on working closely with clients in both design and execution of projects, knowing this often lowers costs and improves quality.

The teams we provide for clients are motivated to share progress and deal with issues jointly with client management.

Our employees value the efficiency and effectiveness that comes from working closely together in the client's interest.

#### 5. DISCIPLINE

We recognize the importance of rigorous compliance with client needs in safety, quality, health and timely execution.

Our teams focus on thorough, timely completion of work schedules and tasks.

Our employees are systematic, rigorous and mutually supportive in all the work we do

#### 6. PASSION

We are passionate about providing employment with dignity. We are committed to supporting our clients and colleagues. We love our work.

### TO WHOM DOES THE CODE APPLY?

The Code applies to and is mandated for all employees, including affiliates, subsidiaries and joint ventures.

FSI personnel who manage FSI's interests in other FSI affiliates shall ensure that the entity adopts this policy.

All employees are responsible for adhering to the standards of conduct set forth in this Code and for raising questions if you are concerned that these standards are not being met. All of us, wherever we work, must behave in accordance with these standards when dealing with co-workers, customers, suppliers, contractors, stakeholders and competitors. When appropriate, businesses should provide a copy of FSI's Third Party Code of Conduct to comply with our standards and principles.

Violations of the Code are cause for corrective action, which may result in disciplinary action up to and including termination of employment and where appropriate referral for criminal proceedings.

FSI is committed to conducting its affairs honestly, ethically, and in compliance with all applicable laws and regulations. The Company is also committed to promoting fair treatment of those who make good faith reports of potential violations of laws, regulations or policies.

Employees are encouraged to report concerns about FSI-related violations of laws, regulations or FSI policies. A good faith report is one that is made with the honest and reasonable belief that a Company-related violation of

law or policy or other instance of non-compliance or related misconduct may have occurred. Attempts to resolve concerns should normally be made by contacting the appropriate manager in the chain of command. If the employee is, for any reason, uncomfortable with this, reports may be made directly to the CEO, Chief Ethics & Compliance Officer.

Retaliation, which is defined as materially adverse action against an employee for making a good faith report of potential Company-related legal, ethics or policy violations, is prohibited and will not be tolerated. If you believe that someone has retaliated against you for reporting a concern or otherwise functioning as a whistleblower, you should bring your concerns to the Office of Ethics & Compliance immediately.

FSI will review complaints of retaliation, and any attempted or actual retaliatory action may subject the violator to disciplinary action.

## **COMPLY WITH LAWS AND REGULATIONS**

### **Our Principle**

FSI is committed to performing with integrity and exceeding our customers' expectations. For this reason, we believe that it is important to comply with both the letter and the spirit of the laws and regulations that govern our business.

You are expected to perform all of your duties on behalf of FSI in compliance with all laws, regulations and Company policies. This is a minimum expectation. The Legal Department and the Office of Ethics & Compliance are always available to help you understand the laws and regulations that apply to your job. It should be understood, however, that upholding our values and this Code may require more than mere compliance with laws and regulations.

If you perform work internationally, you are also subject to the laws and regulations of the countries in which we do business. You may find that there is a conflict between the laws of the countries in which we operate and the laws of the UK or Company policy. You are expected to respect and comply with the laws of the countries in which we operate. Each employee is responsible for understanding and following local laws in the places where he/she works and conducts business. In the cases where the laws may be less restrictive than company standards, employees will be expected to follow company standards. Please consult with Esther Daines, the FSI Lawyer to receive more guidance and direction.

## **ZERO TOLERANCE FOR DISCRIMINATION AND HARASSMENT**

### **Our Principle**

FSI is committed to providing a safe and respectful work environment free from threats, violence, harassment and discrimination. Respecting others and performing with excellence create opportunities to achieve success in our workplace.

You are expected to treat all FSI employees, suppliers and customers with dignity and respect. FSI's goal is to maintain a professional work environment that is free from threats and acts of violence, bullying, abusive or

intimidating conduct or other similar behavior. FSI does not tolerate harassment or discrimination of any kind especially involving race, ethnicity, religion, colour, sex, national origin, age, ancestry, sexual orientation, gender identity or expression, marital status or disability.

As a global enterprise, we recognize that the various countries in which we do business may have different legal provisions pertaining to discrimination and harassment in the workplace. Nonetheless, FSI has set a standard of zero tolerance for discrimination and harassment that applies to all of its employees, wherever they work.

If you are a FSI leader, you have a special responsibility for promoting a positive, diverse and inclusive work environment where everyone may raise issues or concerns without fear of retaliation.

## **MAINTAIN A SAFE AND HEALTHY WORK ENVIRONMENT**

### **Our Principle**

FSI is committed to providing a drug-free, tobacco-free, safe and healthy work environment. FSI observes environmentally sound business practices throughout the world because it is the right thing to do.

You are responsible for complying with Environmental, Safety and Health laws and regulations. Observe all posted warnings and regulations. Report immediately to the appropriate management any accident or injury sustained on the job, or any environmental or safety concern you may have.

You may not be under the influence of alcohol or illegal drugs, or abuse legal drugs, in the workplace at any time. FSI prohibits possession, use, sale, manufacture, transfer, trafficking in, or being under the influence of illegal drugs, or the abusive use of legal drugs, in the workplace or in the performance of company business.

## **RESPONDING TO INVESTIGATIONS AND LEGAL ACTION**

### **Our Principle**

We must pay particular attention to conducting our business and behaving with the highest standards of business ethics.

FSI employees are required to cooperate in internal investigations. You must never destroy or alter any documents or electronic records; lie to or mislead an investigator; or obstruct the collection of information relating to an investigation or any legal action brought on behalf of, or against, FSI. Employees are further requested to respect the confidentiality of the details of an investigation and reveal such specific investigation information only to authorised persons with a need to know.

To the greatest extent possible, FSI shall cooperate with government agencies responsible for investigating suspected violations of law. If requested by FSI, employees are required to cooperate with investigations conducted by the government. You must notify the Office of Ethics & Compliance or the Legal Department immediately if you are contacted by a government agency or any third party conducting an investigation or asking for information pertaining to a suspected violation of law. The Office of Ethics & Compliance or Legal Department will help you review information before it is released to the investigative organization.

## **DO BUSINESS ETHICALLY WHEREVER WE ARE**

### **Our Principle**

FSI's commitment to the highest standards of ethical conduct applies to every employee in every location. Bribery, accepting kickbacks or bribes, violations of export and import laws, and participating in illegal boycotts erode confidence in the Company and the marketplace, undermine democracy, distort economic and social development, and hurt everyone who depends on trust and transparency in the transaction of business.

Unless prohibited by UK or US law, you are responsible for complying with the national and local laws of the countries in which we operate. In the case of a conflict with UK or US law you must obtain direction from the Legal Department. In particular, you must pay special attention to the following laws:

### **Anti-corruption:**

#### **The United Kingdom Bribery Act and the United States Foreign Corrupt Practices Act**

You must strictly comply with the anti-corruption laws that govern our operations in the countries where we do business. Such laws include the UK Bribery Act and the United States Foreign Corrupt Practices Act (FCPA) and similar laws enacted by other countries, and international anti-bribery conventions; for example, the Organization of Economic Cooperation and Development (OECD) Convention on Combating Bribery of Foreign Officials. Generally, these laws prohibit the bribery, direct or indirect, of foreign government officials, political parties or candidates to obtain some improper business advantage. More specifically, they prohibit you, directly or indirectly, from giving, offering or promising anything of value to foreign officials or foreign political parties or candidates for the purpose of influencing them to misuse their official capacity to obtain, keep or direct business, or to gain any improper advantage. In addition, to prevent the concealment of bribery, the FCPA prohibits knowingly falsifying a Company's books and records or knowingly circumventing or failing to implement adequate internal accounting controls.

### **Prohibitions on Kickbacks:**

FSI employees are prohibited from providing or attempting to provide a kickback, soliciting, or attempting to accept a kickback. A kickback is defined as any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind which is provided, directly or indirectly, to any prime contractor employee or subcontractor employee for the purpose of improperly obtaining or rewarding favorable treatment.

As well as gross misconduct and a fundamental breach of the FSI code of conduct this is also a crime under the UK Bribery Act the punishment for which there can be up to ten years' imprisonment.

## AVOID HUMAN TRAFFICKING

### Our Principle

Human Trafficking is a violation of human rights and refers to the forcing, coercion or defrauding of people, though sexual, physical, and/or psychological violence. FSI has a zero tolerance policy regarding trafficking in persons, and all FSI employees, persons connected with employees, subcontractors, and subcontractor employees are expected to strictly adhere to this policy. Under this policy, which is derived from Federal Acquisition Regulation (FAR) 52.222-50, contractors and contractor employees are forbidden from:

- 1) Engaging in severe forms of trafficking in persons;
- 2) Procuring commercial sex acts;
- 3) Using forced labor in the performance of a contract;
- 4) Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- 5)
  - i. Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
  - ii. Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place;
- 6) Charging employees recruitment fees or any other fees, kickbacks or payments of any kind. The FSI policy is that no fees whatsoever are to be paid by candidates applying for employment with FSI. Candidates are to be made aware of this at the point of recruitment and to sign a declaration in their own language that they understand they are not to pay any fees to anyone in connection with their employment with FSI. Employees or partners in FSI's source country recruitment operations are to sign declarations of adherence to this policy and to undergo polygraph integrity testing.
- 7) Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a US Government contract or subcontract, for portions of contracts and subcontracts performed outside the United States.

FSI employees, partners, suppliers, sub-contractors or agents must strictly adhere to these policies and procedures and report any actual or suspected violations of this policy to their manager and our CEO, Chief Ethics & Compliance Officer. FSI employees shall avoid any situation where their actions could create the appearance of human trafficking.

FSI employees are expected to seek guidance from their manager and the Chief Ethics & Compliance Officer whenever questions arise regarding this policy, and they are expected to promptly report any actual or suspected violations of this policy.

## **AVOID PERSONAL CONFLICTS OF INTEREST**

### **Our Principle**

FSI is committed to upholding the highest standards of ethical business conduct and expects the same of its employees and agents. We all have a responsibility to our customers, owners and partners to act in the best interests of FSI.

A conflict of interest exists when you have divided loyalties; or when you have a direct or indirect personal interest in a transaction or matter, such that it might reasonably appear to affect the judgment that you exercise on behalf of FSI, influence your actions or lead you to neglect FSI business interests.

As a FSI employee, you are responsible for acting in a fair and impartial manner in all business dealings, and placing the interests of FSI over personal interests in matters relating to FSI business.

You must avoid financial, business or other transactions or situations in which your personal interests might conflict with, or appear to conflict with, the interests of FSI. Such situations may arise from relationships with customers, competitors, suppliers, present or prospective employees, or from the acquisition or use of Company assets for personal gain. An actual conflict of interest does not need to be present to constitute a violation of this Code; you must also avoid activities that create the appearance of a conflict of interest.

A conflict of interest may exist when you use your contacts or position in the Company to advance interests other than the Company's; such as your own private business or financial affairs, or those of a friend or relative (whether or not at the expense of the Company). You should never use Company property or information for personal gain, or take for yourself personally any opportunity that is discovered through your position at FSI.

You must disclose in writing any situation, transaction or relationship that might give rise to an actual or potential conflict of interest to your manager, who will review the disclosure with the Legal Department.

## **PROPERLY ENGAGE CONSULTANTS, REPRESENTATIVES AND OTHER THIRD PARTIES**

### **Our Principle**

Business integrity and commitment to obeying the law are key considerations in the selection and retention of those who represent FSI. FSI recognizes the critical role our partners and suppliers play in maintaining our reputation and ability to do business worldwide. Accordingly, we expect third parties with whom we do business to adhere to the ethics and compliance standards set forth in FSI's Third Party Code of Conduct.

You must not retain a consultant, sub-contract or representative, or another third party to conduct business in a manner that is contrary to FSI's policies or procedures or to circumvent our values and principles. For example, you must not retain consultants, representatives or other third parties for the purpose of paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of a third party without authority, or improperly gaining inside information or influence.



You are responsible for seeking advice from the Legal Department prior to retaining an international consultant. Consultants and representatives must certify their willingness to comply with this Code, FSI's policies and procedures, and all applicable laws and regulations.

## **PROTECT SENSITIVE INFORMATION**

### **Our Principle**

FSI employees, contractors, agents, consultants, customers and business partners regularly trust the Company with information. We generate sensitive information in our day-to-day work, and we regularly receive sensitive information from our customers, suppliers and others.

You may not disclose or receive sensitive business information, including proprietary Company information, without proper authorization. You must keep sensitive information, including any proprietary documents such as trade secrets, bid and proposal information, technical information, marketing information, etc, protected and secure. You may only disclose sensitive business information if you have the proper authorization to do so. In the course of normal business activities, suppliers, customers and competitors may sometimes divulge to you information that is proprietary to their business. You may only accept or use the proprietary information of a supplier, customer or competitor if such use or acceptance complies with Company policy. If you receive proprietary information from a supplier, customer or competitor without proper authorization, such as a non-disclosure agreement, you must immediately bring this to the attention of the Legal Department or the CEO.

## **PROTECT PERSONAL INFORMATION**

### **Our Principle**

FSI employees, contractors, agents, consultants, customers, business partners and members of the Board of Directors entrust personal information to us, such as home address, social security information and medical information. To sustain a culture of trust, we must protect this sensitive data and use it only for authorised purposes.

You must not access personal information unless you have a need to know for legitimate business purposes and have prior authorization. If you have access to personal information (including personnel or medical records), you may not disclose such information without proper authorisation. You must keep personal information protected and secure in accordance with all corporate policies, laws and applicable third party agreements. You must never use personal information for any purpose for which it was not intended or for personal gain.

If you collect or access personal information on behalf of FSI, you are responsible for knowing and complying with all applicable laws and policies that govern such activities.

If you become aware or believe that personal information has been accessed by an unauthorised person, disclosed inappropriately, used for purposes other than FSI business, or gathered in violation of Company policy or the law, you must immediately bring this to the attention of the Legal Department or the CEO.

**Practical example:**

**Q.** I overheard a colleague sharing another employee’s salary information with others who did not have a need to know. I think this is wrong. What should I do?

**A.** Report the incident to your manager or the CEO right away.

## **PROPERLY USE COMPANY AND CUSTOMER ASSETS**

### **Our Principle**

FSI’s resources and assets do not belong to any of us individually. They belong to the Company and its owners, and we have a responsibility to protect them, acting as stewards of that property. We have the same responsibility to protect all customer resources and assets that are entrusted to FSI.

You are responsible for the proper use of Company and customer property, electronic communication systems, information resources, materials, facilities and equipment. You must use and maintain these assets with the utmost care and respect, guarding against waste and abuse, and you must never borrow or remove them from Company or customer property without management’s permission.

Company assets should only be used to conduct FSI’s business. You must seek guidance and permission before using any company asset for personal use. You may not use the Company’s resources to support a personal business or for an illegal act or a purpose that would cause embarrassment to FSI.

### **Our Principle**

FSI employees shall use Company-issued and government-issued Information Technology (IT) resources respectfully, responsibly and appropriately in accordance with relevant Company Ethics, Security, Legal and IT policies.

FSI and government-furnished equipment (GFE) is intended to be used for business operations; however, employees are allowed limited personal use in accordance with FSI’s policy on Personal Use of FSI Assets, provided that the use does not conflict with or interfere with normal business activities. All employees are prohibited from using IT equipment in ways that are disruptive, abusive, obscene, degrading or offensive to others. This prohibition includes the transmission of sexually explicit messages, images or cartoons; ethnic slurs; racial comments; or anything that could be construed as harassment/defamation/slander, or otherwise harming another person or business. Additionally, every effort will be made to follow local laws and to adhere to culturally-sensitive customs. Employees or other authorised users of FSI or government-provided/managed communications services shall not access the Internet to log onto web sites that contain any prohibited material. Employees shall not install unauthorised software on Company or government IT assets or copy software and/or its documentation except where there are appropriate license agreements in place. FSI employees shall not engage in activity that may compromise the security or the integrity of FSI’s proprietary information or copyrights.

### **Practical Example:**

**Q.** Can I use my FSI or client/government-issued computer to download movies, pornography or music?

**A.** No. (Unless music or movies were purchased through an on-line media outlet such as iTunes.) This would legally be considered an inappropriate use of your asset and could result in disciplinary action up to and

including dismissal from FSI. In some cases, movies/music can take up bandwidth needed for Company operations.

**Q.** Can I install a program that will help me personally or professionally?

**A.** Contact your manager to gain permission. They will advise whether the software can be installed on the asset and whether or not the installation would impact either FSI, client or GFE networks.

**Q.** Can I install software on my personal computer, which is connected to a FSI, client or GFE network?

**A.** Any computer connected to a FSI or GFE network has the same possibility/probability to impact the network. Therefore, any personal computer that is to be connected to a FSI or GFE network must be inspected by IT personnel who will ensure there are no applications that could compromise the network and that appropriate security patches and anti-virus software is in place.

## **CORPORATE COMMUNICATIONS, PUBLIC AFFAIRS AND SOCIAL MEDIA**

### **Our Principle**

FSI is committed to providing accurate, consistent and timely information to its workforce and external audiences, and to building and maintaining a positive corporate reputation through proactive media relations, marketing and philanthropic activities. Many of FSI's customers have policies of their own regarding the public release of information, and all employees are expected to abide by these policies by directing all media inquiries to FSI Communications.

All employees are expected to demonstrate respect and professionalism when communicating with other employees, customers, teammates, sub-contractors and others at work, whether or not they are at a FSI facility. The expectation of professional conduct extends to communications in any format, including but not limited to: verbal conversations, e-mail, and personal communications through discussion boards, blogs, social networking sites, etc. While employees may express their individual beliefs, they must be clear that these expressions represent a personal view, and they may not imply in any way that their opinion is the view of FSI management.

Should an employee choose to identify FSI as their employer on a social media platform or public website, that employee is considered to be a representative of FSI. Therefore, that employee's comments or posts would be considered within the scope of FSI policy, as they have the potential to reflect on the Company.

Practical Example:

**Q.** I frequently post pictures and talk about work via my Facebook page. Is this not allowed?

**A.** Depending on the nature of your work and the contract you support, you may be limited in what you can post on your social platforms. For instance, if you work at a secure facility, you may be prohibited from certain activities, such as posting pictures of your physical surroundings and describing your daily safety procedures. Also, depending on the contract for your program, you may be prohibited from releasing certain information about your program to the public, via the mainstream media or your personal social media platform. It's always best to check with Communications first, to ensure compliance with FSI and customer policy.

Who can I speak with if I have questions?

Your manager or the CEO.

## **CORPORATE PHILANTHROPY**

### **Our Principle**

FSI is committed to maintaining a corporate philanthropy program through which our charitable donations and employee volunteer efforts can significantly impact the communities near our program locations, and demonstrate our commitment to acting with integrity and social awareness.

All employees of FSI are encouraged, but not required, to participate in Company-sponsored events and campaigns that benefit the communities where we live and work. As an employee of FSI, you are always welcome to submit ideas and implementation plans for corporate philanthropy or volunteer initiatives. It is often through the suggestion of an employee that FSI identifies and pursues a philanthropic initiative, and we are committed to maintaining a philanthropic program that serves those causes which our employees consider most important.

FSI does not prohibit its employees from mentioning their outside-of-work interests to colleagues. However, employees are prohibited from active solicitation through Company equipment or on Company-paid time; or from pressuring colleagues to join or donate to any personal cause or favoured organisation. Managers should be particularly careful when communicating with their subordinates, to avoid even the perception of pressuring employees to support a certain cause.

Who can I speak with if I have questions?

The Company Legal Director or CEO for more information.

## **PARTICIPATE IN ETHICS & COMPLIANCE TRAINING**

All FSI employees are expected to participate in ethics and compliance training on an annual basis. Completion of this training is a condition of your continued employment with FSI.

## **AGREEMENT TO POLYGRAPH INTEGRITY TESTING**

All FSI personnel and relevant partners and suppliers are required to undergo randomized polygraph testing to ensure their adherence to the core business ethics of FSI. The questions to be tested on will be specifically around our commitment against taking money from candidates and accepting bribes or other illicit benefits in breach of the UK Bribery Act of 2010 and the US Foreign Corrupt Practices Act.

## **INTEGRITY TESTING BY 'MOLES' OR 'MYSTERY SHOPPERS'**

Moles or mystery shoppers who are trusted contacts will be sent through the FSI recruitment systems in order to report back on their experience. They will confirm that they are being treated in line with the FSI policies and code of conduct and that they are specifically not being required to pay any fees or unauthorised expenses in connection with their employment by anyone involved in or connected to FSI. They will also report back on how they are treated by FSI staff. In the event that there is evidence of non-compliance or mistreatment the relevant culprits will be disciplined. Where, in contrast, there is exceptionally good performance the staff in question will be rewarded.

## ANNEX A TO THE FSI CODE OF CONDUCT

### FSI CODE OF CONDUCT RELATING TO THE PROTECTION OF OUR PERSONNEL ENSURING MIGRATION AND EMPLOYMENT WITH DIGNITY PRINCIPLES FOR THE RESPONSIBLE RECRUITMENT AND EMPLOYMENT OF MIGRANT WORKERS

- Principle 1**      **No fees are charged to workers**  
The employer is to bear the full costs of recruitment and placement. Migrant workers are not charged any fees for recruitment or placement.
- Principle 2**      **All worker contracts are clear and transparent**  
Migrant workers should be provided with written contracts in a language each worker understands, with all terms and conditions explained clearly, and the worker's assent obtained without coercion. These contracts are to be provided early in the recruitment process so that workers can make decisions early rather than being pressured at the last minute into a decision.
- Principle 3**      **Policies and procedures are inclusive**  
Migrant workers' rights should be explicitly referred to in employer and migrant recruiter public human rights policy statements, relevant operational policies and procedures addressing human rights responsibilities.
- Principle 4**      **No workers' passports or identity documents are retained**  
Migrant workers should have free and complete access to their own passport, identity documents, and residency papers, and enjoy freedom of movement.
- Principle 5**      **Wages are paid regularly, directly and on time**  
Migrant workers should be paid what they are due on time, regularly and directly.
- Principle 6**      **The right to worker representation is respected**  
Migrant workers should have the same rights to join and form trade unions and to bargain collectively as other workers. FSI fully supports that all workers should have the right to form trade unions and bargain collectively – however certain employing countries in which FSI operates do not allow this and as such FSI is required to respect these laws. In such countries it is FSI's commitment to act on the workers' behalf to ensure issues that cannot be addressed through collective bargaining are represented to employers by FSI.
- Principle 7**      **Working conditions are safe and decent**  
Migrant workers should enjoy safe and decent conditions of work, free from harassment, any form of intimidation or inhuman treatment. They should receive adequate health and safety provision and training in relevant languages.

**Principle 8****Living conditions are safe and decent**

Migrant workers should enjoy safe and hygienic living conditions, and safe transport between the workplace and their accommodation. Migrant workers should not be denied freedom of movement, or confined to their living quarters. There are certain occasions in high threat locations where FSI accepts that restrictions are placed on movement from accommodation and the work place.

**Principle 9****Access to remedy is provided**

Migrant workers should have access to judicial remedy and to credible grievance mechanisms, without fear of recrimination or dismissal. The FSI CEO is the point of contact for any grievances that employees have and his mobile number is provided to all employees.

**Principle 10****Freedom to change employment is respected, and safe, timely return is guaranteed**

Migrant workers should be guaranteed provision for return home on contract completion and in exceptional situations. They should not, however, be prevented from seeking or changing employment in the host country on completion of first contract or after two years, whichever is less. FSI fully supports the individual's right to freedom of movement for alternative employment after their initial contract is completed. FSI also endeavours to ensure a welfare system to allow personnel to travel home in the event of a serious compassionate issue and enables the individual to return to employment as appropriate when the issue is resolved or addressed.

## ANNEX B TO THE FSI CODE OF CONDUCT

### SUMMARY OF THE FSI CODE OF CONDUCT

1. All personnel are to be treated fairly and with respect at all times - no bullying or intimidation.
2. Integrity is to be respected at all times - it is unacceptable to lie or give fraudulent information either internally or externally, whatever the reason.
3. Respect the FSI policy to protect personnel from exploitation - no fees or unauthorised expenses are to be charged to potential candidates, personnel being deployed to projects, or employees.
4. Respect correct business etiquette – no kickbacks or bribes are to be paid or accepted.
5. No benefits are to be accepted by individuals from suppliers or partners.
6. Conflicts of interest are to be avoided.
7. Personal conduct – no illegal or immoral behavior.
8. Be prepared to be questioned on your adherence to the FSI vision and values and code of conduct.
9. Expect to be inspected both overtly and covertly.
10. Know the code of conduct – ensure you read and understand the code of conduct in detail.
11. Live the company values.
12. If in doubt refer to your manager or to the FSI legal officer or CEO.

I have read, understood and agree to the terms outlined in the FSI code of conduct.  
Signed (employee)

Name:

Date:

Signature:

I have witnessed the named employee read, understand and sign this FSI code of conduct.  
Signed (manager/employer)

Name:

Date:

Signature: