

# Commtech Ltd

## RESPONSIBLE BUSINESS – CORPORATE SOCIAL RESPONSIBILITY POLICY

### **1. Managing Director’s Introduction**

We attach great importance to good business practices and believe ethical and responsible management will impact positively on all stakeholders including shareholders, employees, customers and other communities with whom we have dealings.

As a leading national company, Commtech accepts responsibility as a good corporate citizen and the Board has set clear standards and expectations for its operations.

It is our aim to continually improve our management of social, environmental and economic issues, and in doing so, we will achieve a high standard of responsible care for people and the environment whilst maximising business efficiency and growth.

### **2. Responsible Business Policy – Group Corporate Social Responsibility (“CSR”)**

It is Commtech policy to operate responsibly with respect to the environment, all stakeholders and communities on whom Commtech operations throughout the world have a potential impact.

The company commitment to responsible business is fully supported by the Board of Commtech which has endorsed the policy and performance against it.

To underpin and establish a solid framework around the responsible business policy the Board has adopted the following detailed policies and has established management systems for their implementation:-

1. Responsible Business – Corporate Social Responsibility Policy
2. Ethics Policy
3. Legal Affairs and Compliance Policy
4. Health, Safety and Environment Policy
5. Corporate Governance Policy
6. Community Policy
7. Donations Policy
8. Human Rights Policy
9. Communications and Investor Relations Policy
10. Whistleblowing Policy
11. Supply Chain Policy

### **3. Reporting**

We will report on our policy of responsible business on our website, and we will publish relevant information about our activities and performance in a timely and appropriate manner.

### **4. Implementation**

Board level responsibility for CSR matters rests with the Managing Director who has set up a steering group to ensure relevant policies are put into effect by operational management with guidance and support from specialist headquarters’ personnel where appropriate. Performance objectives are set and monitored at both local and Group level. Our practice is to identify priority areas that address issues of particular relevance to our businesses.

The operational executive directors of Commtech are also involved as champions of responsible business standards and practices across the business. The Managing Director and other senior personnel at each and in all areas of the business are required actively to communicate and implement appropriate local objectives consistent with the policy and any corporate priorities. The Executive Committee of the Board continuously monitors performance and reviews objectives in relation to relevant matters and reports to the IMI Board with periodic updates and an annual review of CSR matters.

Signed by:

A handwritten signature in black ink, appearing to read 'S. Hawkins', with a horizontal line extending to the right.

S. Hawkins, Managing Director  
on behalf of Commtech Ltd  
Dated: 12 Oct 2007