

Commtech Ltd

HUMAN RIGHTS POLICY

1. Managing Director Introduction

This policy on human rights is one of a series of governance policies which are implemented throughout the Company to ensure that Commtech employees behave responsibly and reflect the Company's values at all times.

The Board of Commtech Ltd has endorsed this policy and expects all Commtech employees to comply with it. The Management are responsible for the detailed oversight of the operation of this policy and reports to the Board as and when appropriate matters arise and with an annual review.

2. Objectives

- Promote respect for essential human rights.
- Promote employment practices which comply with applicable law and reflect our high ethical standards.
- Establish accountability for adherence to the policy.
- Require prompt internal reporting of concerns about breaches of the policy.

3. Human Rights Policy

Commtech policy is to respect internationally recognised human rights standards in the workplace and to adopt good employment practices consistent with applicable law.

This policy owes much to the Universal Declaration of Human Rights and other relevant international conventions and guidelines.

Key features of what this policy requires of business units and employees across the Company are as follows:

- Our aim is to ensure that Commtech employees are able to work in an environment free of physical, psychological, verbal, or sexual abuse or other harassment.
- We promote merit based employment decisions and have, therefore, adopted an "Equal Opportunities" policy. This includes working to eliminate discrimination in hiring, compensation, promotion, training, termination or retirement based on race, caste, colour, national origin, sex, religion, disability and marital status.
- No forced, bonded or involuntary prison labour will be used
- Guided by applicable standards, the prevailing knowledge of the industry and any specific hazards, our aim is to provide a safe and hygienic working environment for all employees. Similarly, we aim to minimise the impact of our operations and our products on the environment and not to jeopardise the health or safety of those living near our operations, or those using our products. These aims are expanded and underpinned by our "Health, Safety and Environment" policy.
- No children are to be employed by Commtech. We support the long-term objective to eliminate child labour consistent with the United Nations Convention of the Rights of the Child.
- Employees shall be paid wages and benefits for a standard working week that meet or exceed minimum national requirements.
- The working hours of Commtech employees shall comply with applicable laws.
- National laws concerning an individual's freedom of association and collective bargaining shall be complied with at all times.

4. Reporting of Breaches and Accountability

Any employee who becomes aware of any existing or potential breach of this policy is required promptly to notify the Group Human Resources Manager. If preferred, concerns

about any existing or potential breaches may be reported in accordance with the Company's whistleblowing policy.

In enforcing this policy, the Company will take or authorise such disciplinary action as it deems appropriate up to and including dismissal of the individual(s) responsible.

5. Enquiries

All enquiries in relation to this policy or its applicability to particular roles or situations should be addressed to the Company Human Resources Manager.

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