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## Code of Conduct

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ITgma is a company with a strong commitment to social responsibility. We are committed to acting fairly and with integrity towards our stakeholders, to observing the applicable rules of law, and to supporting and respecting internationally proclaimed human rights.

ITgma is committed to ensuring that working conditions within ITgma are safe, our workers are treated with respect and dignity, and that all our processes are environmentally responsible.

We commit in all of our activities, to operate in full compliance with the laws, rules, and regulations of the countries in which ITgma operates. Our Code of Conduct draws on internationally recognized standards to advance social and environmental responsibility.

### Standards for labor and human rights

ITgma is committed to upholding the human rights of workers and to treating them with dignity and respect as understood by the international community. This applies to all workers, including temporary, student, contract, direct employees, and any other type of worker.

The labor standards are as follows:

#### ***Freely chosen employment and prevention of involuntary labor and human trafficking***

ITgma does not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work are voluntary and workers are free to leave work or terminate their employment with reasonable notice. Workers are not required to surrender any government-issued identification, passports, or work permits as a condition of employment. ITgma ensures that third-party agencies providing workers are compliant with the provisions of the Code and the laws of the sending and receiving countries, whichever is more stringent in their protection of workers. ITgma ensures that contracts for both direct and contract workers clearly convey the conditions of employment in a language understood by the worker.

#### ***Child labor avoidance***

Child labor is not allowed in any activity of our company. The term *child* refers to any person under the age of 18, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greater. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported.



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### ***Working hours***

Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Work weeks are not to exceed the maximum set by local law. Workers are allowed at least one day off every seven days. All overtime is be voluntary.

### ***Wages and benefits***

Compensation paid to workers complies with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. In compliance with local laws, workers are compensated for overtime at pay rates greater than regular hourly rates. ITgma offers vacation time, leave periods, and holidays consistent with applicable laws and regulations. ITgma pays its workers in a timely manner and clearly convey the basis on which workers are being paid.

### ***Humane treatment***

In ITgma there is no harsh or inhumane treatment of workers including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers. Disciplinary policies and procedures in support of these requirements are clearly defined and communicated to our workers.

### ***Non-discrimination***

ITgma is committed to a workforce free of harassment and discrimination. ITgma does not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, or marital status in hiring or employment practices such as promotions, rewards, or access to training. In addition, workers or potential workers are not subjected to medical tests that could be used in a discriminatory way.

### ***Diversity***

ITgma is committed to diversity in its workforce, diverse in professional discipline, nationality, gender, race, culture, ethnicity, language, age, religion, and sexual orientation. We seek those differences and seize the opportunities that our great diversity offers in achieving the goals.

## **Standards for health and safety**

ITgma recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy working environment enhances the quality of our products and services, the consistency of production, worker retention and morale. We also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are as follows:

### ***Emergency Preparedness***

Potential emergency situations and events are identified and assessed, and their impact is minimized, by implementing emergency plans and response procedures, including emergency reporting, employee



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notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans.

### ***Occupational injury and illness***

Procedures and systems are in place to prevent, manage, track, and report occupational injury and illness including provisions to encourage workers to report, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate return of workers to work.

### ***Sanitation and food***

In ITgma, workers are provided with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities.

### ***Health and safety communication***

In order to foster a safe work environment, ITgma provides workers with appropriate workplace health and safety information and training, including clearly written health and safety information and warnings, in the primary language of the workers.

## **Standards for environment**

ITgma recognizes that environmental responsibility is integral to producing world-class services and products.

The environmental standards are as follows:

### ***Environmental permits and reporting***

All required environmental permits, approvals, and registrations are obtained, maintained, and kept current, and their operational and reporting requirements are followed.

### ***Pollution prevention and resource reduction***

ITgma endeavors to reduce or eliminate solid waste, wastewater, and air emissions (including energy-related indirect air emissions) by implementing appropriate conservation measures in their production, maintenance, and facilities processes, and by recycling, reusing, or substituting materials.

### ***Hazardous substances***

Chemicals and other materials posing a hazard are identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.



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### ***Wastewater and solid waste***

Wastewater and solid waste generated from our operations are characterized, monitored, controlled, and treated as required by applicable laws and regulations prior to discharge or disposal.

### ***Certification***

ITgma possess ISO 14001:2004 certification which verifies our commitment to environment and environmental standards.

## **Standards for Business Ethics**

ITgma is fully committed to the highest standards of ethical conduct when dealing with our workers, suppliers, and customers.

### ***Business Integrity***

The highest standards of integrity are upheld in all business interactions. ITgma has a *zero tolerance* policy to prohibit any and all forms of bribery, corruption, extortion, or embezzlement (including promising, offering, giving, or accepting any bribes). All business dealings are transparently performed and accurately reflected in ITgma's business records. Monitoring and enforcement procedures are implemented to ensure compliance with anti-corruption laws.

### ***No improper advantage***

Bribes or other means of obtaining undue or improper advantage are not to be offered neither accepted.

### ***Disclosure of information***

Information regarding business activities, structure, financial situation, or performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices is not acceptable.

### ***Intellectual property***

Intellectual property rights are highly respected, and the transfer of technology and know-how is done in a manner that protects intellectual property rights.

### ***Fair business, advertising and competition***

Standards of fair business, advertising, and competition are supported. Appropriate means to safeguard customer information are available.

### ***Privacy***

ITgma is committed to protecting the reasonable privacy expectations for personal information of everyone we do business with, including suppliers, customers, consumers, and employees. We comply



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with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, or shared.