

BRANDED TRUST FOUNDATION

Inspira's Social Responsibility Code

Inspira CSR Code
2014

Inspira Diamonds Pty Ltd (Inspira)
ACN: 97 117 437 662

Social Responsibility Code

Inspira (hereby defined as all staff, including management and owners) commits to:

- Transparent and accountable decision-making
- Treating all people involved in or affected by Inspira with dignity and fairness
- Behaving ethically and fairly in all commercial dealings
- Using the planet's limited resources responsibly
- Sustainable procurement, consumption, production and distribution
- Having an effective social responsibility program
- Complying with or exceeding all local and international legal and regulatory obligations.

In order to ensure these commitments are met, Inspira adopts the standards set out below:

1. Management

- Inspira will make decisions and conduct itself as a socially responsible organization at all times to enhance its reputation, support its long-term sustainability and be a responsible citizen.
- Inspira will make a positive social impact on the communities where it operates, will comply with both the letter and the spirit of all laws, and be accountable and transparent in decision-making and activities.
- Inspira will publicly report on its social performance at least annually.
- Inspira regards information concerning any actual or suspected breach of the code as critical business intelligence and commits to
 - a) acting promptly, fairly and decisively on that information in conformity with procedures and
 - b) ensuring that members providing that information are protected from adverse consequences or harm as a result of that disclosure.

- Inspira requires all staff to report actual or suspected breaches of the Code promptly. It invites all stakeholders to report actual or suspected breaches of the Code. All such reports can be made using the contact person noted at the bottom of the Code for Compliance or using the Feedback System.

2. Responsible Business Practices: Procurement and Marketing

Inspira will:

- comply with all competition policy, trade practices and consumer laws and regulations
- purchase from suppliers who are committed to social responsibility principles
- conduct business with government and suppliers with honesty, fairness and integrity
- conduct business with and customers with honesty, fairness and integrity.

3. Occupational Health and Safety and Human Rights at Work

- Inspira will promote safe work practices, ensure the health and safety of employees and others is secure by taking precautionary measures to protect employees, customers, contractors and others from hazards in the workplace.
- Inspira will respect human dignity and protect human rights by ensuring equal opportunity, equality and diversity within the workplace irrespective of age, race, ethnic or national origins, gender, sexuality, disability, marital status and religious belief.
- Inspira accepts the legitimate activities of trade unions.
- Paid part-time work by children under the age of 16 is permissible where: the work is i) of reasonable duration (not exceeding 20 hours per week) ii) outside school hours and iii) approved by a parent or guardian and iv) allowed by law.

4. Sustainable Resource and Relationship Management

Inspira commits to the principle of sustainable consumption by:

- minimizing its carbon footprint by choosing carbon offset programs and renewable energy alternatives
- reducing consumption of energy, water and materials consumption
- reducing the production of waste, including toxic and hazardous substances

Inspira]commits to dealing responsibly with waste products by:

- disposing of waste in the least harmful way possible
- complying with all waste disposal laws and regulations

- Inspira commits to using sustainability as a criterion to be applied in decisions relating to the growth and expansion of Inspira.
- Inspira commits to taking a precautionary approach toward environmental risks and commits to continuously improve its environmental practices wherever and whenever possible.
- Inspira commits to identifying and measuring the direct and indirect impacts it may have on the communities it operates in.
- Inspira commits to engaging stakeholders and providing them with opportunities to express their interests and concerns.

5. Implementation, Innovation and Continuous Improvement

- Adopting this Code commits Inspira to having social responsibility principles a core component of its activities.
- Inspira commits to continuously developing, innovating and improving the processes and systems that support social responsibility.
- Inspira commits to participating in independent audits or reviews assessing key aspects of its social responsibility and sustainability systems and processes.

6. Compliance with the Code

Queries on the meaning of the Code or concerns about compliance with this Code should be brought to the attention of the following person:

Name: **Charmaine Thane, Director**

Email: **Charmaine@inspiradiamonds.com**

i. Practices developed from the code

As the person responsible for the construction and compliance of this code, I realise these are broad guidelines about how the company behaves in all its interactions. This code forms the basis on Inspira's CSR procedures (separate document), which outlines the practices that Inspira uses to align itself with the code. The business practice document is not exhaustive, and any behavior/decisions and should be looked at the context of the CSR code outlined here.

ii. Staff engagement with the code

All staff are required to read, sign their commitment to, and conduct themselves in a manner outlined in the code, and the practices, in all of their interactions as representatives of Inspira Diamonds.

Any staff member is entitled to question a decision or behaviour that they feel does not fit within the code, without fear of reprimand or rebuttal.

iii. Breaches of the code

Any stakeholder is entitled to question a decision or behaviour that they feel does not fit within the code, without fear of reprimand or rebuttal.

Principle Sources Table

(minor sources omitted)

Field	Source	Norm Type and Principles
Governance and Management	<p>Primary:</p> <ol style="list-style-type: none"> 1. UNDP: Governance for Sustainable Human Development, 1997 2. UN Millennium Goals (Target 8A) <p>Secondary:</p> <ol style="list-style-type: none"> 3. OECD Guidelines for Multinational Enterprises 4. OECD Principles of Corporate Governance; 5. ISO 26000; 6. UN-sponsored Principles of Responsible Investment 	<p>General principles (soft law) defining governance:</p> <ul style="list-style-type: none"> • Transparency (principle), • Accountability (principle), • Equity and Inclusivity (principle), • Rule of law (principle), • Participatory (process), • Responsive (process), • Effective and efficient (process) <p>* The UNDP definition is taking on customary legal characteristics</p>
Ethical Business Practices	<p>Primary:</p> <ol style="list-style-type: none"> 7. UN Convention Against Corruption (NCAC) 8. UN Global Compact/ISO 26000 9. OECD Due Diligence Guidance for Responsible Supply-Chains of Minerals from Conflict-Affected and High-Risk Areas/ Dodd Frank Act Section 1502 (See also: 3. 4 and 5 above) 10. Chartered Institute of Marketing (UK) 11. Purchasing Managers Association 12. Fairtrade International Standards 13. UN Convention on International Sales of Goods (Vienna Convention) 	<ul style="list-style-type: none"> • Substantive hard law anti-corruption standards • UNGC Principle 10 (anti-corruption) • Disclosure and procedural requirements <ul style="list-style-type: none"> • Marketing and advertising standards (integrity, honesty) • Procurement Standards (integrity, honesty) • Sustainable procurement commitments • Good faith (lex mercatoria)
Social and Equitable Practices	<p>Jus Cogens/Treaty Law Human Rights</p> <ol style="list-style-type: none"> 14. International Bill of Rights (hard and soft law, customary and jus cogens) 15. UN Guiding Principles on Business and Human Rights 16. UN Convention on Rights of the Child 17. UN Convention on the Rights of Women 18. Prohibition Against Torture <p>Labour and Employment</p> <ol style="list-style-type: none"> 19. ILO Occupational Health Services Convention, 1985 (No. 161) and its accompanying Recommendation (No. 171); 20. ILO Occupational Safety and Health Convention, 1981 (No. 155) and its accompanying Recommendation (No. 164); 	<ul style="list-style-type: none"> • The International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights and its two Optional Protocols. • Dignity, equality, freedom from discrimination, freedom of thought, conscience and religion, freedom of opinion and expression, peaceful assembly and association, prohibition against slavery or servitude, torture, cruel, inhuman or degrading treatment or punishment

	<p>21. Working Document of the Twelfth Session of the Joint ILO/WHO Committee on Occupational Health, 5-7 April 1995.</p> <p>22. OHSAS 18000 (ISO 18000) Workplace Management System</p> <p>23. ISO 26000</p> <p>24. Fairwork Unfair Dismissal Code (Commonwealth Government of Australia-representative of international best practice standard)</p>	<ul style="list-style-type: none"> • Fundamental principles of rights and privileges of work and workplace safety.
Sustainability and Environment	<p>General Principles</p> <p>25. Report of the Brundtland Commission, <i>Our Common Future</i> and General Assembly Resolution 42/187</p> <p>26. UN Framework Convention Against Climate Change and Kyoto I and II Protocols (targets)</p> <p>27. Agenda 21 and RIO +20 (Rio Declarations on Environment and Development)</p> <p>28. Cites Treaty/Stockholm Convention (harm principle applied to animal life)</p> <p>29. Convention on Environmental Impact Assessment in a Transboundary Context, <i>opened for signature</i> Feb. 25, 1991, 30 I.L.M. 800 (see also Montreal Protocol).</p> <p>Procedural</p> <p>30. ISO 14000 and various similar private protocols</p>	<ul style="list-style-type: none"> • Doctrine of <i>res communes</i>, the public trust doctrine and state responsibility (<i>Trail Smelter</i>) • Principle of sustainable consumption • Principle of common but differentiated responsibility (CBDR) • Principle of sustainable development • Harm principle applied to animals and environment • Harm principle applied to air and pollution
Stakeholder Engagement	<p>31. UN SESA Framework</p> <p>32. UNEP Guidelines on Stakeholder Engagement</p> <p>33. Good Practice Principles for Stakeholder Engagement, International Finance Corporation, Washington</p> <p>34. Various private stakeholder engagement protocols</p>	<ul style="list-style-type: none"> • Engagement process frameworks <ul style="list-style-type: none"> ○ Indigenous ○ Environmental/mining ○ Climate change ○ General
Social Audit and Reporting	<p>35. SAI 8000 (audit protocols)</p> <p>36. Global Reporting Initiative social reporting framework</p> <p>37. International <IR> Reporting Framework.</p>	<ul style="list-style-type: none"> • Social audit (accounting) standards and procedures • Social report frameworks, structures and essential content