

External Social Responsibility Policy: Respecting People and Communities

Date: November 2015



External Social Responsibility Policy

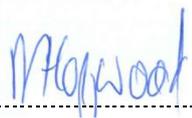
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APPROVED

Name: Mark Hopwood

Signed: 

Date: 31 November 2015

DOCUMENT CONTROL

Contact for enquiries and proposed changes: General Manager, HR

AMENDMENT	DATE	PAGE	DESCRIPTION	AUTHORISED



PURPOSE

The purpose of the external social responsibility policy (Policy) is to provide for:

- Arrow International Group Limited's (Arrow) commitment to the OECD Guidelines for Multinational Enterprises (Guidelines); and
- The obligations of Arrow's personnel and Arrow's subsidiary companies in relation to human rights.

1. Introduction

- 1.1. The Guidelines set out non-binding principles and standards for responsible business conduct for Multinational Enterprises operating in or from adhering countries.
- 1.2. The essence of the human rights chapter of the Guidelines is that Multinational Enterprises should respect human rights and avoid causing adverse human rights impacts in the course of their operations.
 - 1.2.1. the policy can be viewed at <http://www.oecd.org/corporate/mne/1922428.pdf>
- 1.3. New Zealand is a signatory to the Guidelines, and as such, is guided by relevant international Declarations and Conventions, including but not limited to:
 - 1.3.1. the International Covenant on Civil and Political Rights (ICCPR);
 - 1.3.2. the International Covenant on Economic, Social and Cultural Rights (ICESCR); and
 - 1.3.3. the Universal Declaration of Human rights (UDHR).
- 1.4. Multinational Enterprises should, within the framework of internationally recognised human rights, the international human rights obligations of the countries in which they operate, as well as relevant domestic laws and regulations, comply with the specified requirements under the Guidelines.
- 1.5. Arrows Values are Passion, Integrity and Challenge.
- 1.6. Arrow recognises the important role it plays in the lives of its employees, clients and communities and is committed to the principles of the Guidelines and the protection of human rights in the operation of its business.
- 1.7. Arrow recognises that some of its subsidiary companies operating in their own jurisdictions will not be Multinational Enterprises. However as a matter of good faith:
 - 1.7.1. all Arrow subsidiary entities, while not bound by the Guidelines, are committed to the principles of the Guidelines in the operation of their businesses.



2. The Guidelines

- 2.1. The Guidelines set out principles and standards for responsible business conduct in the following areas:
 - 2.1.1. information disclosure;
 - 2.1.2. employment;
 - 2.1.3. industrial relations;
 - 2.1.4. human rights;
 - 2.1.5. environmental issues;
 - 2.1.6. combating bribery;
 - 2.1.7. consumer interests;
 - 2.1.8. science and technology;
 - 2.1.9. competition; and
 - 2.1.10. taxation.

3. Human Rights

- 3.1. Arrow is committed to the protection of human rights in the operation of its business.
- 3.2. Specifically, Arrow is committed to:
 - 3.2.1. treating its employees with respect;
 - 3.2.2. providing a safe and fair workplace for all employees;
 - 3.2.3. treating clients fairly and with respect;
 - 3.2.4. respecting human rights in all client relationships; and
 - 3.2.5. contributing to the social and economic development in the communities in which it operates.

4. Due Diligence

As part of the operation of its business, Arrow is committed to carrying out a risk based due diligence process. The purpose of the risk based due diligence process is to identify, prevent and mitigate any actual or potential adverse impacts to human rights that are either caused by or contributed to by Arrow.



5. Remediation

- 5.1. Where a potential or actual adverse impact to human rights is identified, Arrow is committed to:
 - 5.1.1. following any recommendations made as part of the risk based due diligence process;
 - 5.1.2. taking reasonable and appropriate steps to prevent or mitigate a potential adverse impact from actually occurring;
 - 5.1.3. taking reasonable and appropriate steps to remediate an actual adverse impact;
 - 5.1.4. taking reasonable and appropriate steps to prevent any further adverse impacts occurring in the future;
 - 5.1.5. integrating any recommendations made as part of the due diligence process into its business operations moving forward;
 - 5.1.6. effectively communicating with those actually or potentially affected by the adverse impact to human rights;
 - 5.1.7. monitoring its compliance with any recommendations made as part of the due diligence process; and
 - 5.1.8. appropriately communicating its response to any actual or potential adverse impacts to human rights identified.

6. Complaints Process

- 6.1. Any concerns under this Policy should be directed to the General Manager Human Resources, at the following contact details:

Phone: 09 306 2828

Written correspondence to:

Arrow International

PO Box 4398

Shortland Street

Auckland 1140

Attention: General Manager Human Resources
- 6.2. The General Manager Human Resources will investigate any human rights complaints made to Arrow under this Policy. Should the complaint have merit remediation will take place as specified in section 6 above.
- 6.3. If your concerns are not resolved through the above contacts, then the Ministry of Business, Innovation and Employment (**MBIE**) is the New Zealand National Contact Point for the Guidelines and is responsible for investigating complaints alleging a breach of the Guidelines in New Zealand.