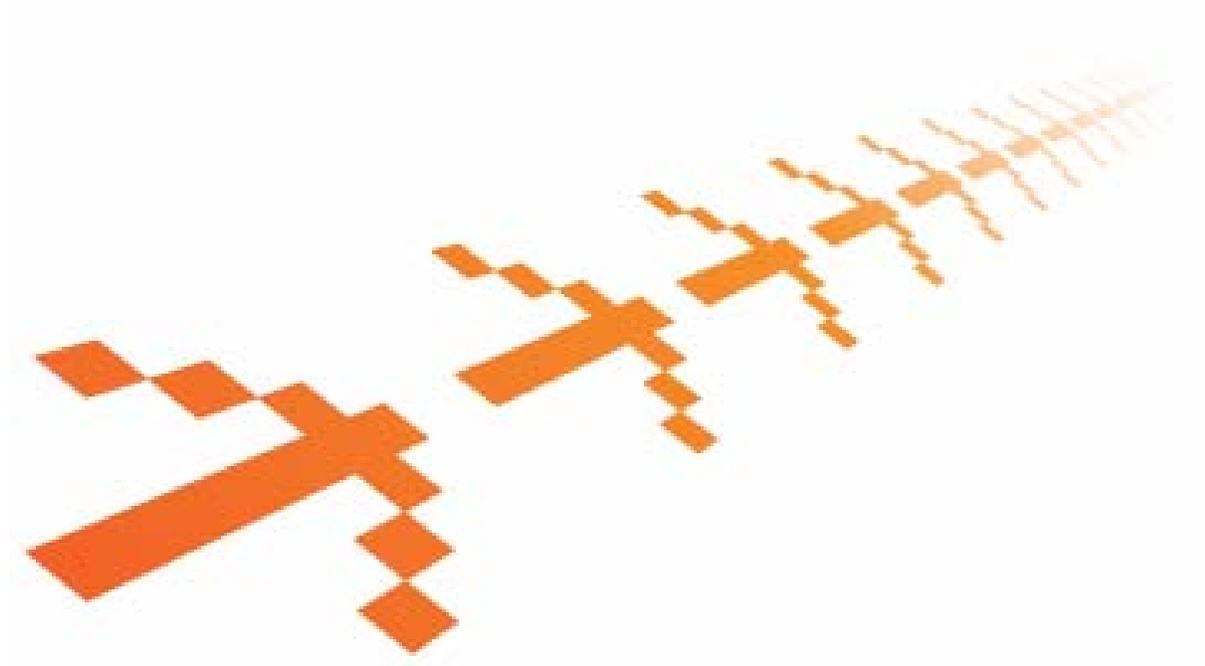


Leadership in formulation science



ICI Group Code of Conduct

January 2007



English



→ Contents

	Page
Group Chief Executive's Message	03
The ICI Way	03
About the ICI Group Code of Conduct	04
Who is responsible?	04
Who needs to comply?	04
What does it mean for you?	04
The Code in Summary	06
1. Business Integrity	07
Legal Compliance	07
Competition Law	08
Confidential Information	09
Conflicts of Interest	10
Gifts and Entertainment	11
Insider Trading	12
Bribery and Facilitation Payments	13
Corporate Governance	14
2. Employee Responsibility	15
Respect for the Individual	15
Use of IT systems	16
Health and Safety	17
Security	18
Substance Abuse	19
3. Environmental Stewardship	20
Protecting the environment	20
4. Customer and Supply Chain Responsibilities	21
Customers and Suppliers	21
Product Stewardship	22
5. Community and Social Awareness	23
Local Communities	23
Political Contributions	23
The Global Community	24

→ Group Chief Executive's message

Trust and integrity are essential for any business. If our customers, our investors, our suppliers and our communities didn't trust us as a company and as individuals, and didn't trust the quality of our operations and products, then we would soon be out of business.

The sure way to gain and keep people's trust is to comply with the regulations that govern our industry, with the laws that apply in every country in which we operate, with our own policies and standards and to behave in keeping with our own ICI Code of Conduct. Doing business competitively and aiming for excellence and leadership is essential for our success. Doing business with integrity is just as important. That is the ICI Way.



John D G McAdam
Chief Executive

→ The ICI Way

ICI is committed to meeting the expectations of customers and consumers by conducting its business in a sustainable way – responsibly and with integrity. We believe our activities should generate economic benefits, create opportunities for enhanced quality of life, respect the environment, and be a positive influence in the communities in which we operate.

We call this set of values the ICI Way, and this Code of Conduct is designed to ensure that we translate the ICI Way into practice. We will be helping to build a successful, world class company that we can truly be proud of by adhering to the standards set out in the Code, in each of its five sections:

- 1 Business Integrity
- 2 Employee Responsibility
- 3 Environmental Stewardship
- 4 Customer and Supply Chain Relationships
- 5 Community and Social Awareness



→ About the ICI Code of Conduct

Who is responsible?

The ICI Board of Directors has overall responsibility for the Code of Conduct, and, each year, the Group Vice President Sustainability and the Chief Internal Auditor make a report to the Board on the operation and effectiveness of the Code worldwide.

Within each ICI International Business and the Regional and Industrial Businesses, the Chief Executive Officer is responsible for introducing the Code of Conduct and for ensuring compliance through a local implementation and monitoring plan that takes account of the local business environment and cultures.

Who needs to comply?

The Code applies to all ICI employees worldwide, including those employees working in each of ICI's international businesses and subsidiaries, businesses in which ICI holds a controlling interest, and all individual contractors working full-time for ICI.

We also expect our business partners and all third parties acting for ICI, or in the name of ICI, to be familiar with and to comply with the Code.

What does it mean for you?

We appreciate that not every section will apply to everyone in his/her current job. However it is essential that you have an awareness of the whole Code, and that you thoroughly understand all the sections that apply to you personally.

You will be expected to participate in specific Code of Conduct training, and to sign an acknowledgement that you understand the Code and will adhere to it at all times.

By defining minimum standards and offering examples of what those standards mean in practice, the Code has been designed to act as a first point of reference for any situation you might find yourself in. If you are unsure about how it applies, a good starting point is to ask yourself some key questions:

- Is this activity illegal?
- Could it cause any harm or loss to you, your colleagues, the company, people doing business with us, or members of the public?
- Would you feel awkward if you had to tell your manager about it?
- Would it be embarrassing for ICI if an account of the activity appeared in the newspapers or the news on TV?

If the answer to any of these questions is “yes” then the Code of Conduct is almost certainly being violated. Remember that an action can just as easily be something said as something done.

If you are still not sure, then you need to get clarification. Talk to your line manager, or your local human resources contact or an ICI in-house lawyer. If you are a line manager and are unsure what advice to give one of your employees you should raise the matter with your own manager.

Violations of the Code of Conduct are serious matters. They will result in disciplinary action being taken against those involved, including the possibility of dismissal. If the law is being broken, criminal charges could be brought, and you may well be fined personally.



→ About the ICI Code of Conduct

If you have reason to believe the Code is being violated, or is about to be, it is essential that you bring the matter to the attention of your line manager, or any senior manager, immediately. If you feel you are unable to do this, you can use our confidential 'whistleblowing' telephone service – Speak Up. You can find the toll-free Speak Up number on posters and bulletins posted at your work location or by contacting human resources.

Don't feel embarrassed about speaking up. Even if it turns out that you were mistaken about your suspicions, you will not be penalized for raising concerns if you were acting in good faith. It is a matter of policy for ICI to support open and fair discussion of issues and worries. And remember, by highlighting a possible breach of the Code at the earliest opportunity, you might very well be preventing the escalation of a minor matter into a very serious one – and helping the people involved.



→ The Code in summary

Don't break the law

This is a minimum requirement expected of every ICI employee in every country in which we operate. There are never any exceptions.

Respect your colleagues

Any form of discrimination on the basis of an individual's race, colour, religion, gender, age, marital status, sexual orientation or disability is fundamentally unacceptable, as is any form of bullying or harassment.

Don't compromise your integrity

Never exploit your position at ICI to obtain a benefit or advantage for yourself, your family or your friends.

Protect confidentiality

Any confidential information you obtain in the course of your work, whether it is about ICI, another company or an individual, must only be used for the purpose intended.

Be careful with gifts

Never offer, or accept, gifts or entertainment of a value that might be thought by others to influence the recipient's business judgement.

Never bribe or be bribed

Whether offered or received, any form of unauthorised payment – in cash or in kind - intended to win improper advantage is strictly prohibited and may well be illegal.

Don't intentionally mislead

Never try to falsify any records, financial or otherwise.

Keep everybody safe

Health and safety regulations and procedures are designed to protect you and your colleagues. Follow them at all times.

Protect the planet

Take every opportunity to put environmental stewardship into practice – protect the environment, conserve energy and eliminate waste.

Respect our business relationships

Always treat our customers and suppliers fairly.

Be a good neighbour

Get involved and build long term relationships with our local communities.

If in doubt, ask

If you are unsure about a particular application of the Code, or you believe it is being violated, talk to your line manager, or your local human resources contact or an ICI in-house lawyer. If there is a reason why you can't do that, use the anonymous *Speak Up* phone line.

→ 1 Business integrity

Integrity is a general term for living by a set of values or beliefs. Business integrity, for an ICI employee, means fulfilling your responsibilities in accordance with the values embodied in the ICI Way. It means that you are accountable for your own actions and for the effect they have on the company, your colleagues, our customers and suppliers, and the wider community.

Business integrity has implications in a number of different areas.

Legal Compliance

It is ICI policy to fully comply with all laws and regulations that relate to its activities in every country in which we operate. It is your personal responsibility as an ICI employee to make sure that you are aware of, and abide by, those laws and regulations that apply to your job. This fundamental principle applies even in situations where particular laws are not actively enforced.

We recognise, of course, that legal systems are often highly complex and change over time. For example, ensuring ongoing compliance with employment and labour laws and laws relating to intellectual property, protection of the environment and the importation of products can be particularly difficult. If you are at all unsure how the law applies to you in your job, you should ask for advice from your line manager, your ICI in-house lawyer, or another knowledgeable professional such as a SSHE manager.

Because of the nature of our business, we also need to be acutely aware of national laws and international agreements designed to prevent products from being used for illicit purposes, such as chemical weapons or illegal drugs.

Legal Compliance - Scenarios

- *Juan Pablo is aware that the local laws governing equipment inspection at his site are in the process of being revised. As things stand, ICI will be in breach of these new laws if he doesn't revise his inspection procedures. However, he feels sure that the laws won't be enforced and, anyway, he is convinced that the current procedures are entirely safe. There is also the important matter of the additional downtime that complying with the new laws will cause. But Juan Pablo also knows that he has no choice but to comply.*
- *Annabelle is delighted that the new product line she is responsible for is proving so successful. However, her human resources manager advises her that in order to meet the demand, the production staff are working overtime in excess of the legal limit. The staff are not complaining, they welcome the extra money they are making, and hiring additional permanent staff could prove costly if demand is not maintained. However, even though the staff won't like it, she has to do something to reduce the amount of overtime they are working, and comply with the legal limit.*
- *Browsing the internet, Rob finds an article that he is keen to incorporate in a presentation he is preparing. As he starts to 'cut and paste', it occurs to him that the article might be protected under copyright law. Wisely, he consults his ICI in-house lawyer before going any further.*
- *Sanjay receives a sales call from someone who wants to buy a product that ICI doesn't actually manufacture. Sanjay could just forget about it. But he doesn't because he knows that the product in question is actually restricted by the Chemical Weapons Convention. He notifies his line manager immediately.*

→ 1 Business integrity

Competition Law

Virtually all countries now have competition laws, sometimes known as anti-trust or anti-monopoly laws, to prevent interference with a competitive market. ICI, which supports the principle of free enterprise and the competitive market system, requires full compliance with these laws even in areas where they are not enforced.

Penalties for non-compliance are severe both for the company and individuals and all employees who deal with customers, suppliers or competitors must participate in the regular training we provide on competition law. Other employees who feel they need training or advice on local competition laws should consult their line manager or their ICI in-house lawyer.

ICI has a policy of total compliance with competition laws (see the Group *Anti-Trust Compliance policy*).

Scenarios

- *Loretta is attending a trade association meeting. Between sessions, she is approached by a counterpart from an ICI competitor. He suggests that they have a chat about pricing policy and invites her to a drinks party to which he has also invited a number of people from other competitor companies. Loretta declines the offer. She also informs her in-house lawyer who confirms that it would have been very unwise of her to attend. A social chat may well be illegal if competitors talk about prices and markets.*
- *Ming Hui has conducted a feasibility study which indicates that there would be a number of financial advantages if output were reduced from his manufacturing facility and the products bought from an ICI competitor instead. He would like to discuss the idea with the competitor but first consults his in-house lawyer, who advises him on what is achievable within the constraints of applicable competition law.*
- *One of Diarmuid's neighbours works for a company that is both a competitor and a customer of ICI. When Diarmuid and his neighbour meet at a party, the conversation turns to business. The neighbour mentions that deliveries from ICI have become a bit unreliable in recent months. This is becoming a problem, since he has almost run out of inventory on several occasions. He goes on to ask Diarmuid how he sees the market generally and whether ICI is forecasting the current rapid growth to continue. Diarmuid realises that he has to be careful. He notes his neighbour's concerns about ICI's supply performance and offers to report the problem to the appropriate people. But he then changes the subject quickly and reports the conversation to his in-house lawyer.*

→ 1 Business integrity

Confidential Information

All information obtained at work should be considered confidential, unless it is freely and publicly available. With that definition in mind, it is clear that ICI employees, at all levels, are regularly exposed to confidential information – information about our business, our customers and the products we produce and sell.

Usually this information belongs to ICI, but sometimes it will belong to customers, suppliers or other third parties. In such cases, you must treat the information exactly as you would if it belonged to ICI. You should also note that it is never acceptable to attempt to solicit confidential information from a third party without specific approval from your line manager.

Whatever the source of any confidential information you have, you should only ever use it for the purpose intended – in most cases this will be to carry out your job. It should never be disclosed to anyone other than colleagues or other authorised people who have a need to know. Please be aware that the obligation to keep information confidential continues even after you leave ICI.

There may also be specific restrictions on the use of particular types of information. These could come from signed confidentiality agreements with customers, suppliers or other parties, or from legal requirements governing the disclosure of price-sensitive stock market information.

Particular care should always be taken to prevent the accidental disclosure of confidential information. This could happen when working or discussing work in public places – on a bus, train or plane, at an airport or in a restaurant. It can also happen when transmitting information electronically. E-mail is not a secure method of communication, and it is very easy to send messages to the wrong address accidentally.

Confidential Information – Scenarios

- *After a long day at work, Alex remembers his laptop but forgets his briefcase when getting off the train at his local station. The briefcase contains some highly confidential papers. He contacts the lost property office and is relieved to learn that his case has been handed in. On collecting the case, he is even more relieved to see that the papers are still in it. But that is not the end of the story for Alex. He still needs to report the incident to his manager because he has no way of knowing if anyone else has seen or copied the papers.*
- *Yvonne has applied for a job with a competitor of ICI and has been invited for an interview. The interview panel keep asking Yvonne about the marketing of a new ICI product she has been closely associated with. She is tempted to win the favour of her interviewers by giving them the information they want. After all, if she is offered the job, she won't be working for ICI much longer and then it wouldn't matter anyway. Or would it? Yvonne should not disclose the information.*
- *Prakash receives a fax, sent from a law firm, which should have gone to one of ICI's competitors. It contains information about a confidential project which is potentially of great interest to ICI. Prakash's first reaction is to pass the fax on to some of his colleagues. But he is reminded that what he should do is inform the law firm of the mistake, destroy the fax and keep the matter confidential.*
- *While talking to a customer who also buys regularly from an ICI competitor, Natasha is asked to disclose some valuable information belonging to ICI. It would be an easy thing to do and it might influence the customer in ICI's favour. Natasha refuses to be swayed but she does offer to talk to her in-house lawyer about the possibility of a confidentiality agreement.*

→ 1 Business integrity

Conflicts of Interest

Anything you do which benefits you, your family or your friends at the expense of the company is a conflict of interest. Even if you don't actually benefit but it appears as though you might, there is still a potential conflict of interest. And any conflict of interest, actual or potential, compromises your integrity.

Conflicts of interest can arise in many different ways. For example, using your position within the company to give advantage to another person or another organisation would be a conflict of interest. If a member of your family works for ICI and you have managerial responsibility for that person, you must seek guidance from your own line manager. Working for a customer, supplier, distributor or competitor of ICI would also be a conflict of interest. As would having a financial interest in such a company – although it is generally acceptable to have an investment in a business provided that your ownership doesn't give you any management influence or control.

Conflict of Interest - Scenarios

- *Dan has regularly used a local property maintenance firm, Rapid Repairs, to carry out work at the ICI site for which he is responsible. Chatting to his contact at Rapid Repairs one day, Dan casually mentions that he needs to do some work on his own house. His contact offers to do it for him at a discounted rate. Dan immediately sees the potential conflict of interest and rather regrets having mentioned it at all.*
- *Vaishali is asked to arrange a caterer for an event her boss is organising. When Vaishali's brother-in-law hears of this, he asks if he can put in a quote for the job. Vaishali has to decide whether to tell her brother-in-law that she can't accept his quote, or to tell her boss that because of a conflict of interest she has to withdraw from choosing the supplier.*
- *Sam is regularly called on by friends, and friends of friends, to help them solve their domestic IT problems. Word gets around and Sam is approached by an ICI supplier, who asks if he would be interested in earning some extra money. The supplier is about to install a new computer system and wants Sam's help. Even though it is work that he could do in his spare time, Sam is concerned that there may be a conflict of interest in doing paid-for work for a supplier. Before doing anything, Sam checks with his line manager.*
- *Phil has been approached to become a director of an exciting new start-up technology company. He thinks that it would be good experience for him and would benefit ICI, so he discusses the proposal with his manager. She reminds him that his contract forbids any paid activity that could interfere with his ICI employment since this could lead to a conflict of interest. With regret Phil turns down the offer.*

→ 1 Business integrity

Gifts and Entertainment

The giving and receiving of gifts, along with entertaining and being entertained are accepted practices in many parts of the world when negotiating or conducting business with third parties. However, if the gifts become too large or the entertaining too elaborate, this can affect – or be perceived to affect – business judgement. It can also create expectations of special treatment.

Activities of this kind need to be carefully considered, and the following guidelines should always be followed:

- Reasonable business-related entertaining (e.g. dining or attendance at sporting and cultural events) is acceptable where it is customary practice and in the best interests of ICI. You should talk to your line manager to determine what 'reasonable' means in particular situations.
- Gifts may be acceptable when they are appropriate to the business relationship involved. However, any gift with a value of more than US \$150 must be reported to your line manager for approval.
- As a general rule, cash gifts must never be offered or accepted. The only exception would be in those countries where it is customary to give token amounts on ceremonial or festive occasions and when ICI would cause offence by not making such a gift. Even in these situations, approval must be obtained from a senior manager.
- Gifts should not be sent to, or received at, an individual's home address except when it is a social custom (e.g. flowers for births, weddings, sickness or bereavement).
- No gifts or entertainment should ever be offered to a politician, political official, government employee, or a member or employee of a regulatory body without approval from a senior manager.
- In situations where it would be inappropriate to accept a gift but refusing it might cause offence to the giver, it may be acceptable to donate the gift to charity, but only if this is approved in advance by your line manager. If you are ever offered, or asked to give, any gift or entertainment that is in breach of these guidelines, you must inform your line manager promptly.

Gifts and Entertainment – Scenarios

- *Zoë has worked hard all year coordinating the work being done by two ICI suppliers. As Christmas approaches, she is delighted to receive a bottle of wine from one of them but is somewhat embarrassed to receive a case of champagne from the other. She talks to her manager and then suggests to the second supplier that the case might be given as a prize in a charity raffle.*
- *Chris has been heavily involved in a marketing project with an external consultancy. By way of thanking him, the consultancy offers to take him to an international football match, all flights and hotel bills paid for. It seems like too good an opportunity to miss but Chris realises that he must not accept the invitation.*
- *Jane wants to show her appreciation to an external lawyer who has been helping her to prepare a tribunal case that ICI is about to defend. The lawyer has had to give up some of his holiday to ensure that ICI is fully prepared for the case. Jane decides to invite the lawyer and his partner out to dinner, which she is sure would be acceptable. Just to make sure, she checks with her line manager.*
- *As the person responsible for regularly booking the conference facilities at the Claremont Hotel, Bruce is happy to accept an invitation to a champagne reception they are holding. Whilst he is there, the manager of the Claremont offers him free membership of the hotel's gym. Bruce knows that another local hotel is soon to open its own conference facilities and he suspects that the free membership offer is an attempt to persuade him to keep using the Claremont. Bruce decides that he should keep fit somewhere else.*

→ 1 Business integrity

Insider Trading

Neither you nor any members of your family may trade in ICI shares if you have access to unpublished information that could affect the share price of ICI. Divulging that information to any third party, whether or not they seek to benefit from it, is also strictly prohibited.

Any breach of Insider Trading guidelines could result in serious criminal charges being brought against you and anyone else who has acted on information provided by you.

If appropriate, you should acquaint yourself fully with the ICI Code for Securities Transactions by Directors and Relevant Employees.

Insider Trading – Scenarios

- *For the past few weeks, Fleur has been so busy working on a major company transaction that she has had to cancel a number of social events with her friends. When she does manage to meet up with them, they joke that something big must be going on and want to know if it is a good time to buy ICI shares. Fleur makes it quite clear that she cannot comment and manages to change the topic of conversation.*
- *Over a family dinner, Enrique's brother-in-law asks him how things are going at ICI, and whether it is a good time to buy some shares in the company. Enrique knows that the Company will be announcing some developments that are very likely to affect ICI's share price. The family is waiting to hear his answer. Enrique politely says that he cannot comment on such things.*
- *Priddi and her husband both work for the same ICI business. Priddi is part of a team working on plans to divest a part of that business. Since this is share price-sensitive information, she and everyone on the project team have signed an 'insider letter' confirming compliance with company and stock exchange requirements for such information. Her husband does not know about the plans and is getting increasingly frustrated with her long hours and excuses. Priddi reminds her husband of the Code and their responsibilities.*

→ 1 Business integrity

Bribery and facilitation payments

Bribery is illegal in most countries, and can lead to personal criminal prosecution and fines.

Neither ICI or our employees, and agents (those authorised to act on ICI's behalf), shall directly or indirectly:

- Pay any bribes or kickbacks, in cash or in kind, in order to obtain or retain a business or other improper advantage. "Other improper advantage" refers to something to which the company concerned was not entitled, such as a permit for a factory which fails to meet the applicable statutory requirements.
- Make any facilitation payments where this would be a breach of applicable law.

ICI strongly discourages facilitation payments. Facilitation payments are generally defined as small payments made to secure or expedite the performance by a low-level official of a routine or necessary action to which the person making the payment has legal or other entitlement. Even in countries where they are not prohibited by law, employees should strive to minimise and, wherever possible, eliminate them. Any payment must be approved by a senior manager. Where there is any doubt advice must be sought from an ICI in-house lawyer.

If any payments are made, they must be accurately recorded in the accounts of the relevant ICI company.

Bribery and Facilitation Payments – Scenarios

- *Ashok is preparing a legal case for ICI, but he has doubts about the impartiality of the legal system in the country in which the case is to be heard. His doubts are confirmed when he hears that the case has been assigned to a judge who is related to the Managing Director of the company that ICI is in litigation with. His local lawyers inform him that a payment of US \$10,000 would ensure the transfer of the case to a neutral judge. Even though the case could potentially cost ICI hundreds of thousands of dollars, and there is corruption in the legal system anyway, Ashok knows there is only one response he can give to the lawyers – no.*
- *FastFreeze Foods has been an ICI customer for many years. But Helen, the ICI account manager for FastFreeze, is concerned that they may not renew their contract this year. She knows that the President of FastFreeze is the governor of a local school. She also knows that her office has a large number of surplus computers. She contemplates donating the computers to the school but then realises that this could be considered a bribe. She seeks advice from her line manager.*
- *Graham is part of a team responsible for building a site extension that requires a local building permit. Despite filling in all the necessary paperwork, the permit has still not been issued. A local official contacts Graham and indicates that the permit could be issued straight away in return for what he calls a 'speed' fee payable to him personally. Graham is unsure about this and seeks advice from his ICI in-house lawyer.*

→ 1 Business integrity

Corporate Governance

Without exception, ICI will not engage in, or assist, any activity that is fraudulent or designed to mislead.

To guard against such activities, we have a policy of full compliance with accepted accounting rules and procedures at all times. No undisclosed or unrecorded account, fund or asset may be established or maintained. Any information you are asked to provide to auditors, investors, analysts and other such professionals must be accurate, complete and truthful.

Even if you are not directly involved in communicating with external professionals, any record keeping you undertake – financial or otherwise – may be incorporated in any number of different reports. So, every ICI employee has a role to play in maintaining the highest standards of record keeping and corporate governance.

Corporate Governance – Scenarios

- *Having been involved in compiling sales figures, Paul suspects that his boss has reported higher figures than the actual sales for the period. He knows that his boss is under pressure to meet his targets. Paul is in a difficult position, but he has to do something. He could talk to his boss. Maybe it was an honest mistake. Or he could approach a senior manager with his concerns. The other option he has is to call the Speak Up number.*
- *Marie is keen to purchase some new equipment but the cost of the purchase just exceeds her delegated spending authority. It occurs to her that she could make the purchase by splitting it into two parts, each of which she could sign off. However, this would be a clear breach of accounting controls and completely unacceptable.*
- *Tatsuya is responsible for processing expense claims from a number of different managers. Whilst analysing a pile of receipts from one manager's recent business trip, he notices that a number of them appear to relate to personal expenses incurred by the manager's wife. Tatsuya raises the matter with his own boss who tells him that he will take the matter up with the manager concerned.*

→ 2 Employee responsibility

There are two dimensions to Employee Responsibility - the responsibility ICI has towards each employee, and the responsibility that each employee has to ICI. These two dimensions are inter-related. The company can't do its best for you if you don't do your best for the company.

Respect for the Individual

Our vision for the future is based on inspiring and developing the talents of every ICI employee. To that end, it is our firm commitment to treat all individuals, in all aspects of employment, solely on the basis of ability - regardless of race, religion, colour, age, disability, gender, marital status or sexual orientation. At the same time, we expect all employees to show the same high level of respect to each other. Violence or harassment of any kind will not be tolerated.

Respect for the Individual – Scenarios

- *Gordon is a member of an interview panel. One of his colleagues on the panel tells Gordon that he suspects the leading candidate for the job is gay (homosexual). Gordon wastes no time in making it quite clear to his colleague that the candidate's sexual preference is of no consequence whatsoever.*
- *One of Fran's colleagues confides that her boss is harassing her. She is finding it increasingly difficult to concentrate at work and to sleep at night. Fran offers to speak to someone on her behalf but her colleague is adamant that she shouldn't. She tells Fran that she is worried the situation might get worse. Despite her colleague's concerns, Fran knows that she must do something and decides to have a confidential talk with her human resources manager.*
- *Behind her desk, Luciana has a calendar featuring a number of famous 19th and 20th century paintings including several nudes. Two of her colleagues complain – one because she thinks it is sexist, the other because he claims it is irreligious. Luciana thinks they are both being ridiculous. However, she decides there is no point in creating disharmony over such an issue and she agrees to replace the pictures.*

→ 2 Employee responsibility

Use of IT systems

ICI's extensive network of information technology (IT) and telecommunications facilities are provided for the purposes of conducting ICI business. However, a limited amount of responsible, personal use is acceptable. Details are included in the ICI standard "Acceptable use of ICI communication and computing resources".

Always follow the instructions and guidelines given. In particular, never attempt to access inappropriate sites or restricted areas of the network and never do anything that might compromise the network's integrity, such as importing software or material from an unsafe source.

Remember that all information stored on the company's systems is the property of ICI and is confidential. When downloading, copying or distributing information from the internet, always make sure that you are not infringing the owner's copyright.

In order to protect confidential information, take particular care when working remotely with a laptop or other mobile device.

You should also note a number of points relating to the use of e-mail:

- E-mail is not a secure form of communication. The transmission of confidential or commercially sensitive information by this method should be avoided.
- Because of its immediacy, it is very easy to send ill-considered e-mail messages, and it is also very easy to send messages to the wrong recipient
- When sending e-mail to multiple recipients, always use the bcc facility if, by disclosing the circulation list, there is any risk of breaching an individual's personal confidentiality or the company's obligations under privacy or data protection legislation.

Use of IT systems – Scenarios

- *Jackie sends an e-mail giving details of an upcoming meeting to a consultancy advising ICI. He also attaches a document with some background information to read before the meeting. As soon as he presses 'Send', Jackie realises with horror that he has attached the longer version of the background document. This longer version includes information about initial thoughts for some rationalisations within the company which are still highly confidential. He immediately contacts the recipient and asks her to delete the e-mail; he also informs his line manager.*
- *Giovanna's sister is starting a small, home-based business. Last month Giovanna did some simple market research for her sister using ICI's internet access because her sister does not have broadband web access at home and it would have cost her sister a lot to carry out the research. Now her sister has asked Giovanna to use ICI's systems to carry out an extensive e-mail marketing campaign. Giovanna must tell her sister she cannot do this.*
- *On her lunch break Ngozi goes to the photo shop to pick up the CD with photos of her son's recent birthday party. Back at her desk, she wants to send a few of the photos to her husband right away, so she puts the CD into her drive and clicks. A box comes up on screen, and without really reading the text in it, she quickly clicks 'yes' - and launches the installation of the photo shop's software. She quickly clicks 'cancel' hoping that the software does not carry a virus, but also contacts the IT department to make sure that there is not a problem.*

→ 2 Employee responsibility

Health and Safety

All of our safety, security, health, environment, product stewardship and related community standards are encompassed in our independently verified Responsible Care Management System (RCMS). And every ICI business is required to submit an annual report to the ICI Board giving details of its compliance with our global policy and standards.

You can be certain that there is no compromise in our commitment to ensuring a healthy environment and safe working facilities for all of our employees in every country in which we operate. But for our commitment to be effective, it is essential that you play your part by observing the rules and procedures established for your particular ICI site.

Health and Safety – Scenarios

- *Sergio is expecting an urgent call from a customer. An unexpected business meeting requires him to make a two-hour car journey. He explains the problem to his boss, who tells Sergio to take his mobile phone with him so he can deal with the call the instant it comes through. Concerned about the safety implications, he consults the company guidelines. They are quite clear. When the call arrives, Sergio is driving. He allows his phone to take the incoming message and waits until he can stop the car safely before talking to the customer.*
- *Constance overhears a colleague threatening another employee. The employee in question has previously made himself very unpopular and some people take the view that he needs to be taught a lesson. But Constance immediately reports the incident to her line manager. Whatever the provocation, violence or the threat of violence is never acceptable.*
- *Kyong Soo works in an ICI factory in which the use of special cutting tools is required to open packaging. Having lost his tool, Kyong Soo uses an old knife. The knife slips and Kyong Soo cuts his finger badly. Worried that he will face disciplinary action for not following the proper procedure, he decides to wait to treat his finger until he gets home. But a colleague points out the importance of getting prompt treatment and reporting all injuries, and persuades Kyong Soo to do the right thing.*

→ 2 Employee responsibility

Security

Issues of security, which are also covered by the Responsible Care Management System (RCMS), are important both to protect ICI's business interests and to protect you, your colleagues and the community. Always comply with the security procedures at your location.

Security – Scenarios

- *As Iris is entering her building, she notices someone she doesn't recognise trying to enter without a pass. She politely explains that only authorised personnel can enter the facility unescorted and offers to contact whoever it is he wishes to see. The stranger declines her offer, claiming to have forgotten his contact's name. Iris immediately alerts the building's Security personnel.*
- *Walking across his factory site, Dave notices that a section of the perimeter fence is missing. His first thought is that some work is being done that he doesn't know about. But then he thinks that he should report it just in case there has been a breach of security. It turns out that there is work being done that Dave didn't know about. But his Site Administrator thanks him for his vigilance – he had forgotten to put out an announcement about the work.*
- *Johann is due to visit a supplier in Asia in an area where he has heard of recent unrest. He consults his business travel website to check the security briefing information – the area is classified as High Risk - and then telephones an ICI contact in the country for local advice. Having discussed all the available information with his line manager and the regional SSHE manager, Johann decides to delay the visit for a few weeks until the risks have*

Substance Abuse

Working while under the influence of alcohol or drugs is strictly prohibited. It not only impairs your ability to do your job, it can also put you and your colleagues at risk. We are committed to the detection and treatment of substance abuse amongst employees and have a number of programmes in place to help individuals overcome problems of addiction. If you or someone you work with has such a problem, contact your human resources manager for more information.

Substance Abuse – Scenarios

- *Diana notices that one of her colleagues is acting strangely and she thinks he may have been drinking alcohol. She continues to observe him and it is not long before she is sure that her first impression was correct. Even though she doesn't like the thought of getting someone into trouble, she feels she has to report the situation to her line manager for the safety of everyone, including her colleague.*
- *Brian is at a party and has already had several drinks when he is called into work because of an emergency at the plant. Brian is ready to respond to the call but his manager can tell from Brian's voice that he has been drinking. For safety reasons, Brian is told not to come into work.*
- *In the canteen one day, Sandeep notices one of his colleagues taking a particular prescription medicine. Sandeep knows that these pills can make people drowsy. When he mentions it to him, his colleague laughs it off and tells Sandeep that it won't affect him. Sandeep is worried because his colleague has to operate machinery. Realising the potential risks involved, Sandeep feels he has to say something to his line manager. The policy covers all drugs that might affect your ability to do your job effectively and safely.*

→ 3 Environmental Stewardship

Protecting the environment

ICI is investing in technology with a view to maximising process efficiency and minimising our use of raw materials; reducing the amount we landfill, and maintaining the biodiversity on our sites; and cutting back on the release of greenhouse gases, ozone depletors and hazardous substances. Across the board, we are putting our commitment to protecting the environment into practice. We expect you to do the same at your place of work. All of our environmental standards are encompassed in ICI's Responsible Care Management System (RCMS). You should be aware of and follow the environmental protection procedures in your workplace.

Protecting the environment – Scenarios

- *Hans is responsible for completing monitoring reports that are to be submitted to a government agency. When it comes to light that in one area a limitation has been exceeded, a colleague suggests that he alter the data. Hans points out that doing so would not only be in breach of the Code of Conduct, it would also be illegal and, on top of that, it would hinder, not help, ICI's drive for ever increasing standards of environmental stewardship.*
- *Eddie, a site manager, is concerned that the plant's energy consumption has reached a plateau after a two-year decline. The site is now unlikely to help the business meet the Group Sustainability Challenge target for energy reduction. The site is also a strong candidate for an environmental award and the flat energy performance may damage their chances to win it. Eddie calls his team together and says he wants lights around the site to be turned off or dimmed during the evening and night shifts in order to meet targets, adding that this will be good for the environment. The team is worried that it could affect employee safety as well as site security, so Eddie asks the site safety, security health and environment (SSHE) committee to carry out a risk assessment and propose the way ahead.*
- *Kanitta notices that one of her colleagues regularly throws his paper waste into the general waste bins rather than the recycle bin. When she asks him about this, he admits that he can't be bothered to get up from his desk to go over to the recycle bin. Kanitta persuades him to collect the paper and visit the bin once a day!*

→ 4 Customer and supply chain relationships

Customers and Suppliers

ICI is committed to dealing fairly and ethically with all of its customers and suppliers.

Customers and Suppliers – Scenarios

- *Whilst making a routine visit, Etienne notices that a local supplier does not appear to have appropriate effluent treatment facilities. He suspects that chemicals are being dumped in a nearby river. Etienne asks the supplier to explain the complete process, including waste disposal. He then conducts an investigation to see if the actual process conforms to the local legal and regulatory requirements. If not, ICI will encourage the supplier to modify the process. If he refuses, ICI will cease to do business with him.*
- *Cees is managing the tender process for the supply of logistics to his site and has issued a Request for Quotation to five different suppliers. One of the suppliers contacts him to ask for a more detailed breakdown of historic shipments as this will help him to better prepare his response. Having checked the data to make sure that he is not revealing any confidential information about ICI's customers or products, Cees provides the supplier with the information. However, he recognises that he is potentially giving this particular supplier an unfair advantage. So he also forwards the same information to the other four potential suppliers.*
- *Thelma is responsible for managing a long-standing relationship with a global customer, who purchases a product that can be manufactured at various ICI sites across the world. However, when the customer originally contracted to buy from ICI, the product was only manufactured in France and the contract mentions supply from this facility. The French plant is due to stop production for a short period of time to allow maintenance to take place. Thelma does not want to cause her customer any unnecessary concern and knows that she can maintain supplies with product manufactured in Brazil. Even though the customer would be unaware that the product was not manufactured in France, she realises that she has a duty to keep her customer informed of the change and duly does so.*

→ 4 Customer and supply chain relationships

Product Stewardship

It is our belief that our products have a beneficial effect on people's lives and well-being. But because our products contain a range of chemicals, we have to take great care to manage risk throughout the product lifecycle. This requires us to work closely with contractors, customers and all those involved in the supply chain to apply safe and environmentally sound practices. Product stewardship is also encompassed in ICI's Responsible Care Management System (RCMS).

Product Stewardship – Scenarios

- *Liam receives a call from a customer who believes that some of her employees have developed a rash from handling an ICI product. Liam thinks privately that this is highly unlikely since the product has been on the market for some time and he has never heard of a similar complaint. However, he immediately informs his line manager in order that an appropriate investigation can be started as soon as possible.*
- *Kate is working as part of a team trying to introduce a product into a new market in Asia. She is asked if the product complies with the local importation laws. Knowing that the product has been cleared for the UK and US markets, she assumes that there is no problem. A colleague, who has overheard Kate's conversation, advises her to seek expert advice – in line with the standard new product introduction process. Importation laws can be very complex and vary widely from country to country. Non-compliance can be very costly.*
- *Mohammed has been asked to increase production of a particular product. In order to meet a tight delivery deadline, his line manager has also told him not to carry out any more quality assurance testing than they are performing already. Mohammed is concerned. Recognising that the integrity of our products is critical to our success as a company, he politely asks his boss to reconsider. But his boss is insistent. Mohammed knows that he now has to discuss the matter with a senior manager.*

→ 5 Community and social awareness



ICI aims to operate as a responsible corporate citizen within local, national and international communities.

Local Communities

At a local level, ICI is committed to being a role model and building long term partnerships within the communities in which we operate. The company and our employees have a long history of involvement in community activities and organisations through investments of both time and money.

Local Communities – Scenarios

- *Steve's boss is representing ICI in a local community dialogue about the company's plans to build a plant extension. The community is concerned about the possibility of increased noise levels from the new operation. But Steve's boss has been telling residents, based on data provided by external consultants, that there should be no increase in noise. Just prior to another community meeting, Steve is informed by the consultants that new data contradicts their earlier findings. Steve's boss, on being told about this, decides not to share the new information as this might affect the chances of gaining permission for the extension. Steve politely points out to his boss that it is ICI policy to openly and honestly discuss issues of common interest with the local community. But his boss refuses to change his mind. Steve feels he has no choice but to talk to a senior manager or call Speak Up.*
- *Marion is approached by a neighbour who asks if their elected Neighbourhood Safety Committee might be allowed to hold their public meetings in the site canteen several evenings each year. It is the only space in the neighbourhood large enough for the purpose. Marion agrees to ask the site manager for permission, but she is nervous about making the request because it is not work-related. To her delight, her manager agrees to allow the group to use the canteen for the meetings and asks her if the Committee might be looking for other support from the site. He explains that ICI is part of the neighbourhood too, with a shared interest in keeping it safe.*

Political Contributions

It is ICI policy not to participate, as a company, in political fundraising activities. Nor do we make donations to political parties or contributions to political campaigns.

Political Contributions – Scenarios

- *John is the ICI representative in a locality where elections are due to take place in a few months. He is invited to a dinner being hosted by one of the prospective candidates for office. The tickets are US \$2000 per head. It would be a good opportunity for ICI to raise its profile in the area, but John declines. It is clear from the price of the tickets that the event is a fundraising occasion.*
- *Tracey is invited by a government official to a dinner which is described to her as being part of an Industry Consultation programme. After talking to her line manager, she accepts the invitation. Cooperating with a governmental consultation process is not the same as engaging in political activity.*

→ 5 Community and social awareness

The Global Community

Operating in many diverse countries and cultures, ICI is always careful to comply with local laws and to respect local customs and conventions wherever they do not conflict with any of ICI's underlying values.

At the same time as 'acting local', ICI also believes it has a duty to 'think global'. That is why we firmly support the principles of the United Nations Universal Declaration of Human Rights and the United Nations Global Compact.

The Global Community – Scenarios

- *On a visit to a customer's factory, Bei Jun sees a number of young children using various items of equipment. Some of them appear to be no more than 10 years old. Knowing that the use of child labour is prohibited by both the UN Universal Declaration of Human Rights and the UN Global Compact, Bei Jun discusses the situation with the customer. Failing to get a satisfactory answer, she raises the issue with her line manager who assures her that he will follow up with the customer and, if necessary, will stop supplying.*
- *Jerzy finds out from human resources that one of his site's production managers, who oversees a large team, has been openly criticising the fact that site employees belong to a union. The manager has also been pressuring staff to sign up for overtime work nearly every time union meetings are held, effectively preventing many union members from attending. Jerzy arranges a meeting with the manager and cautions him with disciplinary action if this behaviour does not stop. He reminds the manager that ICI supports the right to freedom of association, and that the company has been committed to good employee and good union relations since it was formed in 1926.*
- *Having acquired a small business in a remote region, ICI plans to expand the operation. Yasmin, the new site manager, is initially surprised when no women apply for the expanded number of site jobs. She soon discovers why. Whilst the boys in the region are educated at the local schools, the girls, in line with the region's very traditional culture, are required to stay at home to help the family by doing domestic work. As a result few women in the area are literate. Yasmin, through her relationship with the community leaders, encourages women to apply for jobs for which reading and writing is not needed, and helps establish a community partnership adult literacy programme for local people.*

References

This Code refers to a number of detailed ICI policies. These are available from your local human resources contact.