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| Policy Name | HUMAN RIGHTS POLICY |
| Policy Version | |
| Department / Area | H.R. Department/Quality / Learner Services |
| Created By | Head of Training |
| Amended By | J. Townsend |
| Approved by SLT | |
| Date updated | March 2023 |
| Next Review | March 2024 |
| Document REF | CPL |
| Category | Staff/Learner |
| Covers | Staff / Learner / Both |

OUR AIM IS TO:

Respect and uphold human rights by:

- Avoiding adverse human rights impacts that we may cause or contribute to through our business activities and our relationships, including with employees, communities, joint venture and business partners, suppliers and service providers; and
- Doing business based on fair, lawful and transparent practices.

WE ARE COMMITTED TO:

An approach guided by the: -

- International Bill of Human Rights,
- United Nations Global Compact (UNGC),
- United Nations (UN) Guiding Principles on Business and Human Rights,
- UN Sustainable Development Goals as applicable to our business,
- International Labour Organisation's Declaration on Fundamental Principles and Rights at Work,
- UN Voluntary Principles on Security and Human Rights and the International Code of Conduct for Private Security Service Providers,
- Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, and
- Applicable legal requirements in the jurisdictions in which we conduct our business, including those prohibiting modern slavery;

- Respecting diversity, ensuring equal opportunities and eradicating discriminatory practices;
- Upholding freedom of association and the right to collective bargaining
- Maintaining safe, secure and healthy working environments and conditions that do not infringe on human rights;
- Providing conditions of employment, remuneration, wages and benefits that are fair and competitive
- Respecting the rights of fence line communities and all indigenous people that may be affected or impacted by our business activities, including land tenure and access to water rights;
- Managing human rights impacts in our supply chain;
- Responsibly managing our environmental footprint; and
- Engaging and collaborating with our stakeholders and soliciting feedback to enhance our performance on human rights, associated stakeholder engagement and social value creation.

WE WILL ACHIEVE THESE FUNDAMENTALS THROUGH:

- Identification and mitigation of human rights risks in accordance with guided by the international finance corporation (IFC) Performance Standards and UN Declaration on the Rights of Indigenous Peoples, recognizing the principle of free, prior and informed consent (FPIC);
- Aligning our security procedures with the Voluntary Principles on Security and Human Rights, and the International Code of Conduct for Private Security Service Providers;
- Observing the lawful exercise of the rights of human rights defenders;
- Prohibiting discrimination, retaliation, reprisal, intimidation, violence, abusive behaviour, harassment and victimisation, aligned with our Human Resources and Whistle-blower policies, including against any person who, in good faith, reports or raises concerns regarding suspected human rights violations;
- Providing grievance mechanisms, both internally and externally as appropriate, and seeking to ensure that human rights concerns and complaints are appropriately investigated and reported without impeding on State-based judicial and non-judicial grievance mechanisms;
- Remedying or facilitating access to remedy for any adverse human rights impacts that we identify we have caused or contributed to, without obstructing access to any other remedies that may be available;
- Acting with integrity, opposing corruption and dishonesty in any form in accordance with our Anti Bribery Policy;
- Implementing our Supplier Code of Conduct;
- Enabling safe, adequate working conditions and enduring operations, whilst prohibiting forced labour and child labour;
- Implementing a risk-based approach towards the responsible use of environmental resources and addressing our environmental challenges with due consideration for the rights and interests of all our stakeholders, including fence line communities and indigenous people;
- Applying labour policies and practices that are fair, and in line with local legal requirements and the core conventions of the International Labour Organisation, and which provide for payment of living wages and support employee wellbeing;

- Maintaining constructive relationships and partnerships with representative trade unions and works councils in all jurisdictions where we operate;
- Partnering with local authorities in jurisdictions where we operate to enable delivery of basic services regarding water and sanitation where needed;
- Following our product stewardship approach seeking to ensure that our procurement of chemicals and raw materials does not support conflict, complies with law, as far as possible, limits the impact on human health and the environment; and
- Raising awareness and providing training on our Human Rights our Enterprise Risk Management process, framework and policy;
- Ensuring legal compliance in the jurisdictions where we operate;
- Undertaking human rights due diligence and impact assessments, guided by the UN Guiding Principles on Business and Human Rights;
- Observing land and water rights, and the rights of fence line.