

HUMAN RIGHTS POLICY

Policy number	052	Version	001
Drafted by	John Fordyce	Approved by Board on	09 December 2019
Responsible person	General Manager	Scheduled review date	23 November 2020

INTRODUCTION

The Human Rights Policy articulates the fundamental elements of RCOE's approach to human rights and how RCEO demonstrates its commitment to respect human rights in line with the Universal Declaration of Human Rights and other international frameworks.

PURPOSE

The purpose of this policy is:

1. To document recognition of RCOE's obligation to protect and fulfil human rights and fundamental freedoms
2. To communicate clearly our expectation that all our staff, customers, suppliers and stakeholders respect human rights throughout their operations
3. To make a commitment to action that should be taken where we suspect any abuse within or outside of the organisation
4. To demonstrate RCOE's commitment to preventing modern slavery and understanding this commitment is fundamental to running a responsible, safe and sustainable business model

POLICY

RCOE respects and supports the dignity, well-being and human rights of our employees, the communities in which we live and those affected by our operations.

Our approach to human rights is based upon the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. We undertake due diligence activities to identify, prevent and mitigate adverse human rights impacts of our operations.

We engage with communities to understand the social, cultural, environmental and economic implications of our activities. We provide communities with easily accessible complaints mechanisms and we listen to and take actions to address complaints. We work to optimise the benefits and reduce the negative impacts of our activities, both for local communities and the countries where we might operate.

We reject any form of slavery, forced or child labour.

We will make our consultants, agents, contractors and suppliers aware of, and expect their compliance with, our human rights commitments, through appropriate contractual arrangements and procurement principles. We strive to ensure our stakeholders also respect our commitments to uphold human rights.

HUMAN RIGHTS PROCEDURE

Procedure number	052	Version	001
Drafted by	John Fordyce	Approved by GM on	09 December 2019
Responsible person	General Manager	Scheduled review date	23 November 2020

RESPONSIBILITIES

RCOE will comply with applicable anti-corruption laws and all other laws and regulations relating to its business. RCOE will understand laws and regulations relevant to the business.

RCOE will comply with all international trade laws and sanctions relevant to its operations.

PROCEDURES

Child Labour

Children will not be hired to work for RCOE before completing their compulsory education (as determined by applicable local laws). Notwithstanding local requirements, the minimum age for entry into employment will not be younger than 15 years of age.

Forced or Compulsory Labour

RCOE will not allow forced, bonded or involuntary labour.

Human Trafficking

RCOE will not use labour acquired through human trafficking.

Freedom of Association

RCOE will:

- adopt an open attitude towards the legitimate activities of trade unions
- allow its workers' representatives to carry out their legitimate representative functions in the workplace and not be discriminated against

Wages, Penalties and Working Hours

Wages and benefits, including overtime paid will satisfy, at a minimum, national legal standards or local industry benchmarks, whichever is higher.

In nation states where no minimum wage legislation exists, RCOE seeks to establish a living wage that provides an adequate standard of living for all its employees and their dependants.

RCOE will not deduct allowances or withhold wages as a disciplinary measure or for any other reason that is not permitted by law. Performance-based pay systems are calculated based on reasonable expectations and are clearly defined and communicated.

Working hours will not exceed the national legal standards or local industry benchmarks, whichever provides greater protection for the worker.

Non-Discrimination and Diversity

RCOE will:

- provide a work environment in which everyone is treated fairly and gender, cultural, ethnic, religious or other diversity factors such as disability are respected
- offer employment on the basis of merit
- not base decisions regarding employment on attributes unrelated to job performance (including but not limited to, race, colour, gender, religion, personal associations, national origin, age, disability, political beliefs, marital status, sexual orientation and family responsibilities)

Decisions relating to suppliers, customers, contractors and other stakeholders are based on merit.

Workplace Health and Safety

RCOE will provide:

- safe and healthy working facilities and appropriate precautionary measures to protect employees from work-related hazards and anticipated dangers in the workplace
- workers with regular and recorded health and safety training
- clean and safe accommodation that meets the basic needs of the workers (where this provision is applicable)

RCOE will:

- follow all relevant legislation, regulations and directives in the countries in which the contract activities are undertaken to provide a safe and healthy workplace
- implement systems for the prevention of occupational injury and illness including: standards for fire safety; emergency preparedness and response plans; occupational or industrial hygiene standards; appropriate lighting and ventilation; machinery safeguarding; reporting and investigation of occupational injuries and illness; reasonable and appropriate access to potable water and sanitation facilities
- assign responsibility for health and safety to a management representative

Treatment of Employees

RCOE will create and maintain an environment that treats all employees with dignity and respect and will not use or threaten violence, coercion, sexual exploitation or abuse, or verbal or psychological harassment or abuse.

Policies can be established or altered only by the Board: **Procedures** may be altered by the General Manager.

Biofuels

Biofuels will be sourced from global companies that have policies or standards for the sustainable sourcing of biofuel components. That is, RCOE will demonstrate that the biofuels are not sourced in conflict with agricultural, biodiversity or other environmental values and have a positive lifecycle greenhouse gas emission profile.

World Heritage listed properties and IUCN Protected Areas

Materials will not be sourced from World Heritage listed properties or International Union for Conservation of Nature Protected Areas.

Community Interaction

RCOE, and in turn its employees, will treat members of the community with dignity and respect. RCOE and its employees will not adversely impact on the health or safety of members of the community, nor on their wellbeing by engaging in activities such as threatening behaviour, violence, coercion, sexual exploitation or abuse, or verbal or psychological harassment or abuse.

RELATED DOCUMENTS

- Anti-Discrimination Policy
- Work Health and Safety Policy
- Equal Employment Opportunity Policy
- Environmental Sustainability Policy