



Issued By: Senior Director – Risk & Compliance, Group Director - HR

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Version:

## RESPECT FOR HUMAN RIGHTS

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.



At FIVE, we believe how we do business is as important as what business we do. We are committed to a culture of integrity and ethical behavior, and encourage a culture of openness, honesty, and accountability. FIVE aims to uphold the principles in the Universal Declaration of Human Rights, information set out in the Conventions issued by the International Labour Organization (ILO) and the Ten Principles of the UN Global Compact, in addition to the contents of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises to build a comprehensive view of implementing a policy on human rights.

FIVE is a signatory to the United Nations Global Compact and supports its ten principles on human rights, labour, environment, and anti-corruption.

Our people are our greatest asset; which is why we are committed to protecting the rights of our employees by upholding best practice working conditions and ensuring that our suppliers and contractors do the same. We identified the following material issues: healthy workplaces, training & development, human rights & employment conditions, health & safety, and the changing role of women in the workplace, demonstrating the importance of this range of human rights and labour-related issues to our business. To support the ambition of the new strategy, all our Operating Companies have committed to promoting the advancement of international human rights by ensuring accommodation and employment conditions for all colleagues to comply with the

Within FIVE, we have collaborated through all our cross-functional teams viz. HR, Legal, Sustainability, Procurement, Operations and Security, to understand the key human rights requirements which are essential to the adherence to human rights in the organization.

We conduct human rights due diligence across our value chain, including but not limited to, new markets, suppliers, and materials. Our process continuously develops as we incorporate learnings from multiple stakeholders, human rights defenders, and industry experts.

The following principles of the UN Global Compact are duly considered for the application of this policy –

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights

**Principle 2:** Businesses should make sure that they are not complicit in human rights abuses

### APPLICABILITY

This policy applies to all colleagues of FIVE Holdings and its group entities. The Human Rights Policy is overseen by the company's Board of Directors.

The policy will be reviewed yearly by the Senior Director of Risk and Compliance and the Group Director of HR to identify any revision to the applicable laws and regulations and make changes to the policy in line with them. Any significant business changes may also entail a change to this policy document.

## GUIDELINES

FIVE emphasizes on the following guidelines to ensure adherence to all fundamental human rights within its organization which flows down to its contractor employees:

We recognize that we are part of the communities in which we operate. We engage with communities on human rights matters that are important to them such as land rights, access to water and health. We also engage with people in those communities, including indigenous peoples, traditional livelihoods as well as other vulnerable and disadvantaged groups. Our aim is to ensure through dialogue that we are listening to, learning from and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level. Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business. This includes issues in our

### Community and Stakeholder Engagement



FIVE is committed to protecting human rights in its relationships with stakeholders with which it has a relationship and other people that may be affected by its activity. Regarding the protection of data related to such people, FIVE has designed processes to manage the confidentiality, integrity and availability of data and the resilience of systems that process and store that data, defining a framework for personal data protection in all areas of the business. Refer to the 'Data Privacy' policy for more details.

### Prohibition of child labour

Child labour is defined by the International Labour Organization (ILO) as “work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.” Child labour is considered as a serious human rights issue. FIVE upholds to the principle 5: Labour of the ILO – Minimum Age Convention by the UNGC (UN Global Impact) which stipulates prohibition of child labour to employ below the minimum age of 15 years in case of regular work and 18 years in case of hazardous work (construction) with the company.

### Prohibition of forced labour, human trafficking

Forced labour refers to situations in which individuals are coerced into working using violence or intimidation, or by subtler means such as accumulated debt, the retention of identity papers or threats of denunciation to immigration authorities (defined under - in accordance with the ILO Forced Labour Convention (No. 29) and the Abolition of Forced Labour Convention (No. 105). Forced labour can be in the form of– slavery, bonded labour, physical abduction, sale of a person, physical confinement, forced overtime, as per Principle 4 of UNGC. No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms. Principles 4 and 5 of the ten principles under UNGC emphasize on the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. FIVE advocates the fundamental human rights for children and individuals to not be coerced in any form of work. FIVE does not engage in and condones the unlawful employment or exploitation of children and prohibits the use of all forms of forced labour.

### Diversity, equality, and inclusion

Everyone has the right to recognition everywhere as a person before the law. FIVE promotes a culture of fostering a diverse and inclusive culture will increase motivation, loyalty and, as a result, performance. FIVE is committed to providing equal opportunity to all and is intolerant of discrimination, harassment, disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind, in the workplace and in any work-related circumstance outside the workplace. FIVE works to maintain workplaces that are free from discrimination or harassment based on race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other

status protected by applicable law. We aim to recruit, hire, place, train, compensate and advance people based on needs in the organization and qualifications, skills, experience, and performance of our people.



### **Working hours**

FIVE complies to the local law and regulations on working hours and overtime policy. Our employment contracts clearly detail the working hour policy, including compensatory offs, leave policy and overtime (as per applicable laws). FIVE encourages its suppliers (through the supplier code of conduct) to follow norms as per applicable laws for their employees. (third-party contracted staff). FIVE focuses on creating an appropriate work-life balance, providing employees with opportunities that allow greater balance without undermining the FIVE's needs or the realities of the industry in which it operates.

### **Workplace Security**

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

### **Support to Employees**

FIVE has implemented initiatives through its employee enablement programs promoting them to come forward with new ideas to support employees in case of any grievances or issues faced. FIVE does not exert any force or limitation on employees on their freedom of movement, inter-country travel, etc.

### **Wages and Benefits**

Minimum wage or living wage refers to the wage that enables workers and their families to meet their basic needs and provide some discretionary income. Compensation paid to workers shall comply with all applicable local wage laws, including those relating to minimum wages, pay of incentives above the industry benchmark, overtime hours as per applicability, and legally mandated benefits. FIVE provides basic compensation along with other staff benefits including health insurance benefits, meals and accommodation, transportation benefits to provide all possible benefits to the employees.

### **Land Rights and Water Resources**

We recognize the significant implications regarding respect for human rights that land use and water use across our value chain may have, which we address through specific policy and action. We respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation. Further, all employees have access to clean and safe space, physical access to clean, sufficient, safe, and affordable water.

### **Freedom of association and collective bargaining**

In accordance with the principle 3 of the UN Global Compact, FIVE endeavors to uphold the freedom of association and the effective recognition of the right to collective bargaining. Everyone has the right to form and to join trade unions for the protection of his interests. All employers (suppliers and contractors) and workers are free to voluntarily establish and join groups or the promotion and defense of their occupational interests. Further, genuine negotiations between employers

### **Safe and healthy working conditions**

FIVE endeavors to create a healthy and safe working environment for all its colleagues, contractors, suppliers, and guests. We have implemented detailed standards on ensuring safety in working conditions through injury illness prevention policies, security, and safety policies for public areas, among others. We work to provide and maintain a safe, healthy, and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts. Our Code of Conduct also includes a health and safety section, which requires all employees to contribute to ensuring a safe, healthy, and injury-free workplace for our colleagues and customers. We are committed to providing transparent nutrition information and a range of beverage options to enable consumers to make informed choices consistent with a healthy lifestyle.



and such groups should be encouraged in good faith to arrive at an agreement. However, The UNGC does not require the establishment of means to facilitate these rights in situations where they are restricted under law (e.g. works councils) Refer the '*Freedom of Association and Collective Bargaining*' policy to learn more.

### **Prohibition of harassment, abusive behavior, and violence**

Principle 2 of the UN Global Compact lays emphasis on adopting measures to prohibit any form of human rights abuse. No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment. FIVE does not implement or tolerate, and in all cases prohibits, any form of violence or verbal, physical or psychological mistreatment, harassment, threats, inhumane or humiliating treatment, corporal punishment, or any form of intimidation. No activities shall contribute toward human exploitation, including human trafficking and sexual exploitation of children.

### **Commitments to the environment and local communities**

FIVE acknowledges the right of communities to live in a safe, clean, and healthy environment, given the importance of the environment to destinations where the Company operates. By virtue of its own Code of Conduct, the Company is therefore committed to the protection and preservation of the environment and combatting climate change. This commitment is particularly relevant and expressed as a will to "contribute to preserving the natural environment and landscape, monitoring the impact of its activity and raising awareness about sustainability among all its stakeholders."

Refer the '*Sustainable Policy*' for more details.

### **Zero tolerance of corruption**

FIVE condones any attempt/ practice or illicit actions by any of its colleagues. FIVE does not accept nor offer any kind of bribe, neither financial nor in kind, and will actively combat corruption, crime, and money laundering.

## **HUMAN RIGHTS DUE DILIGENCE MONITORING AND REPORTING**

FIVE acknowledges that human rights due diligence is an ongoing activity, and the guidelines need to be always adhered to. FIVE will monitor its own operations continuously to identify and assess any actual or potential adverse impacts and where necessary, respond effectively to resolve identified issues. FIVE has developed a detailed human rights due diligence process which covers the human rights risk and impact assessment. FIVE performs a periodic human rights risk and impact assessment which includes planning and scoping, data collection and baseline development, risk assessment, impact mitigation, and reporting and evaluation.

This is done through detailed internal review processes, external stakeholder assessments such as surveys to assess risk and impact of human rights and develop and implement any necessary mitigation plans through audits.

### **Roles and responsibilities**

Relevant personnel involved in the implementation of human right risk and impact assessment methodology comprises of the following:

1. **Chief Risk and Compliance officer:** The key responsibility includes developing the process of human right risk and impact assessment, reviewing the aforementioned methodology for future improvement, and ensuring that this methodology is effectively implemented by relevant corporate departments i.e. human rights impacts are identified and mitigated.
2. **Sustainability Director:** Since human rights is majorly covered under the Sustainability framework, key roles and responsibilities include identifying human right issues and severity of impacts related to respective departments Setting control measures and mitigate impacts specified; review human right risks assessment according to human right impact assessment annually; and review and update relevant documents regularly
3. **Group Director of Human Resources:** Since the HR is in close contact with the employees, it is essential for the Group Director of HR to be involved in the process of human rights due diligence, identify stakeholders' requirements, assess the need for new measures to be implemented, interact with the employees to perform such surveys and support in identification of non-compliances.

### **Human rights risk and impact assessment process**

The process can be illustrated as follows:



## Step 1: Scoping

- The first step of human right risks and impact assessment is to scope. Scoping enables executives to become aware of stakeholders likely to be impacted by the company’s business activities. The findings reflect the scope of data collection and anticipated impacts
- Scoping of human rights risks shall include aspects on labour rights, community rights, supply chain, security and safety, environment, and customer rights

## Step 2: Data Collection

- Data collection is a critical step to obtaining human right risks issues, as confirmed by participants of human right risks assessment process, who have direct association with these risks. Notably, participants of the assessment process may also propose additional risks issues beyond the established scope. Outcome of this activity may be as follows –
  - a. Potential human rights risks and impacts associated with the company’s activities
  - b. Identification of right holders or individuals affected from the risk issues associated to the company’s activities, such as shareholders, investors, government agencies and institutions, employees, supplier and contractors, partners, customers, communities and society, and vulnerable groups, namely women, elderly, people with disability, children, indigenous people, migrant labor, third-party contracted labor, local communities, and other such LGBT and religious minority
  - c. Existing mitigation measures/controls the company uses to mitigate these risks
  - d. Identify salient issues that company must monitor and review, as well as issuing measures to reduce said risks
- Following steps are taken for data collection –
  1. Conduct a workshop - The approach in conducting a workshop comprises grouping participants of assessment process according to the predefined topic. The assessment scope is divided according to right holders or individuals affected by business activities throughout the company’s value chain, such as employees, communities and environment, suppliers and contractors, and consumers. Each group identifies all human risks associated with its function that may potentially occur and receptors for each risk. Each share how predefined human right risks are being managed through existing measures and/or risks control by the company. Each group convene to rank inherent and residual risks against pre-defined scoring criteria. Checklists are filled out jointly as per the respective checklists for the different stakeholders. Refer Annexures for details
  2. The objective of this checklist is to help management to foresee human rights risks that may arise from conducting businesses. The following list of questions help users to identify potential risks.
  3.  Low impact activity: any activities that have low human rights risk. The Company may not need to take any additional actions or provide response actions to mitigate the risks
  4.  High impact activity: any activities that the Company may pay additional attention to or take additional actions to mitigate the risks. In case of severe impact activity, the Company may consider more than one action.

If a high-risk activity is identified, the Company must take additional actions to mitigate risks as follow:

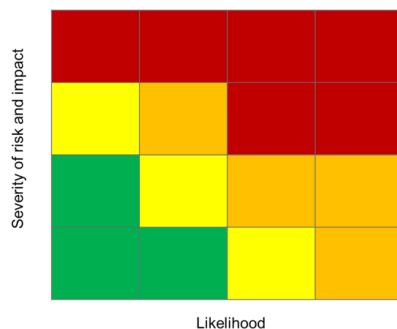
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<input checked="" type="checkbox"/> Comply with contents in the checklist (or stop implementations, as appropriate)	<input type="checkbox"/> Seek additional information before making a decision	<input type="checkbox"/> Contact external or internal experts for appropriate responses	<input type="checkbox"/> Consult external or internal experts for additional activities
<p>For example, under the contractors: have contractors received appropriate training or do employees receive personal protection equipment? If the answer is “no”, the manager should provide the appropriate training to the contractors</p>	<p>For example, under new construction or expansion: are there any homeless people in the area? If the answer is “yes”, responsible functions should conduct additional research on their rights and traffic route that may cause an impact to the homeless.</p>	<p>For example, under child labour: does the company has a child labor termination process in case of child labor law is violated? If the answer is “no”, the manager should consult with a professional to develop appropriate policy, provide educational access and compensation to the family.</p>	<p>For example, under migrant labor: does the factory prohibit using subagents? If the answer is “no”, the manager should consult with the company or agents to ensure that the risk prevention process for migrant labor is appropriate and that the migrant labor will not turn to be a forced labor.</p>

## STEP 3 – Risk Assessment

The severity assessment of impact adheres to human right risks assessment criteria. Risk scoring is according to the 2 primary dimensions of human right risk assessment, which are severity and likelihood, to identify the level of risk. There are 4 levels, which are extreme, high, medium, and low.



### Level of Risks



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## Determination of Risk Severity

- **Scale:** How grave the impact is, for instance, impacts on the right to life or the health and safety of individual workers;
- **Scope:** How many people are or will be affected - for example, impacts on the livelihoods of entire communities or the freedom of association of an entire workforce;
- **Remediation:** Whether it will be difficult to restore the people impacted to a situation that is equivalent to their situation before the impact – for example where religious and cultural heritage of indigenous people has been destroyed.

Criteria for Severity				
	Low (1)	Medium (2)	High (3)	Critical (4)
<b>Scale</b>	Minor impact to health and safety: first aid case	Slight impact to health and safety: minor injury or illness (no loss time)	Moderate impact to health and safety: serious injury that needs rehabilitation (loss time injury)	Significant impact to health and safety: physical disability or fatality
<b>Scope</b>	No negative impact to stakeholder	Impact to some stakeholders in stakeholder group	Impact to most stakeholders in particular stakeholder group	Impact to all stakeholders group (such as local communities, employees, and suppliers)
<b>Remediation</b>	Take less than a year (<1 year) to restore the impact	Take 1-3 years to restore the impact	Take 3-5 years to restore the impact	Impossible to restore or will take longer than 5 years (>5 years) to restore the impact
Criteria for Likelihood				
	Very unlikely (1)	Unlikely (2)	Likely (3)	Very likely (4)
	Almost Never (<10%) Human right violation has never occurred in the company's business activity, but has happened to peers (never/unlikely to happen in 10 years)	Unlikely (≥10% - ≤50%) Human rights violation has happened in the past and may continue to occur sometimes in a department (happened/may happened 1-4 times in 10 years)	Likely (≥50% - ≤90%) Human right violation has happened in the past and may continue to occur frequently today (happened/may occur 5-8 times in 10 years)	Very likely (≥90%) Human right violation has occurred in an ongoing manner until now (happened/may happened every year)



## Human Rights Risk Assessment

1. Identification of salient human rights risks
2. Integrating and Acting on Human Rights Risks and Impacts Identified
3. Verifying Human Rights Compliance in Company, Tier 1 Suppliers
4. Performance tracking and monitoring

### Step 4: Risk Mitigation

Results from human right risks and impacts assessment enable the company to be able to plan and manage impact.

### Actions for Risk Mitigation

Level of risk	Actions
Low	The company continues existing mitigation measures and regularly monitor business activities associated with the risks.
Medium	The company should give attention and consistently monitor business activities identified as having medium risk level.
High	The company has to executive any mitigation measures immediately to lower the risk to an acceptable level.
Extreme	Extremely high level of risk to the point it is unacceptable. The company must terminate or stop the business activities causing the risks immediately.

Once the impacts have been assessed, management measures will need to be identified, particularly for those with high and extreme level of risks. When these management measures have been implemented, the performance must be monitored and review to ensure continuous development for maximum efficiency. After impact management was put in place, the impacts should be re-assessed to inform the company of residual impact.

- Any measures taken must be compatible with international human rights standards as well as a human rights-based approach
- Remediation should be explicitly included; this includes understanding and explaining that compensation and remediation are not synonymous, and that compensation should only be considered as a last resort; and,
- Human rights impacts cannot be subject to 'offsetting' in the same way that, for example, environmental impacts can be. For example, a carbon offset is a reduction in emissions of carbon dioxide made to compensate for or to offset an emission made elsewhere. With human rights impacts on the other hand, since human rights are indivisible and interrelated, it is not considered appropriate to offset one human rights impact with a 'positive contribution' elsewhere.

## **STEP 5: REPORTING**

### Reporting of assessment results:

The company will consolidate results from human right risk and impact assessment in a human rights risk register (part of the human rights policy and the Code of Conduct), to inform executives of the situation and future action plans. Results will be communicated to the Ethics and Compliance Committee as and when human rights risk and impact assessments are conducted.

### Monitoring and assessment:

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Guiding principle on business and human right risks has clearly identified that human right risks and impact assessment needs to be implemented continuously with regular reviews. Human rights risks issues associated to the company's business activities may change, according to the changing activities and stakeholder groups. Notably, performance monitoring and assessment is another crucial process. Establishing the indicators enables performance monitoring and assessment, as well as demonstrate effectiveness of the process, and promoting continuous process improvement.

## Examples of Human Rights Impact Indicators:

Human rights issues	Example of Human rights indicators
Labor Rights	<ul style="list-style-type: none"> <li>• Percentage of employees that are trained on issues of human rights</li> <li>• Percentage of female employees in senior executive level</li> <li>• Number of grievances or lawsuits related to human rights violation by the conduct of corporate. The incidents may not be expected or operation mismanagement from laws or regulation on human rights (number events on discrimination)</li> <li>• Employees turnover rate caused by the violation of human rights, such as; employees resigning due to working unsafely or unhealthy conditions</li> </ul>
Community Rights	<ul style="list-style-type: none"> <li>• Percentage of operation or areas of operation that are assessed on human rights risks and those risks are recognized under the risk management plan</li> </ul>
	<ul style="list-style-type: none"> <li>• Number of grievances that the company receives and resolved, such as; number of involuntary resettlements, number of cases of indigenous rights violations, and etc.</li> <li>• Number of recurrent cases of the same incidents caused by human rights violation, such as; violation of indigenous rights</li> </ul>
Supply Chain	<ul style="list-style-type: none"> <li>• Percentage of institutions and business units that conduct risk assessment in their supply chain (Environment, social, governance, and human rights)</li> <li>• Percentage of suppliers that acknowledge the company's supplier code of conduct</li> <li>• Percentage of suppliers that receive training on human rights</li> <li>• Number of suppliers whose operations are assessed on human rights performance</li> <li>• Number of disruptions or severe accidents cause by mismanagement of supply chain</li> </ul>
Safety and Security	<ul style="list-style-type: none"> <li>• Percentage of operation or areas of operation that are assessed on safety and security risks</li> <li>• Percentage of operation or areas of operation that are assessed on safety and security risks and those risks are recognized under the risk management plan</li> <li>• Percentage of subcontractor security staffs that are trained on human rights</li> <li>• Number of grievances or lawsuits related to human rights violation by the conduct of corporate. The incidents may not be expected or operation mismanagement from laws or regulation on human rights (number human rights violations incidents that occur with subcontractor security staffs.)</li> </ul>
Environment	<p><u>Water Management</u></p> <ul style="list-style-type: none"> <li>• Number of projects that are results of participations of society</li> </ul>

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	<p>and community on water management</p> <ul style="list-style-type: none"> <li>• Number of disputes or conflicts with stakeholders on water management</li> </ul> <hr/> <p><u>Impact of Pollution, Waste Management and Hazardous Materials Management</u></p> <ul style="list-style-type: none"> <li>• Environmentally controlled indicators that are not aligned with regulations, such as; VOCs, Sox and NOx</li> <li>• Environmentally controlled indicators that have been improved.</li> <li>• Number of grievances due to the company's operations caused by non-compliance (including waste and hazardous substances management)</li> <li>• Number of lawsuits due to the company's operations caused by non-compliance</li> </ul> <p>Fines or penalty that is due to non-compliance of operation</p> <hr/> <p><u>Preservation of Biodiversity</u></p> <ul style="list-style-type: none"> <li>• Percentage of areas of operations that risk assessment on biodiversity is conducted.</li> <li>• Number of activities and areas of operations having biodiversity risks that have risks mitigation plan</li> <li>• Number of development projects or research programs to support in activities that promote biodiversity</li> </ul> <p>Increasing or decreasing rate of target/ threaten, key species</p>
Customer Rights	<ul style="list-style-type: none"> <li>• Number of recurrent complaints on company products and services due to the same causes</li> <li>• Number of violations on laws and regulations on product labelling or standards on health, safety, security, social, and environment throughout product life cycle. This includes number of incidents that violate consumer rights.</li> <li>• Percentage of incomplete cases of providing information required by law to customers.</li> </ul>

## TRAINING AND COMMUNICATION

This policy is hosted on the intranet thereby being accessible to all employees. Periodic trainings are conducted through townhalls, and human rights recognition forms a part of the orientation program for all new colleagues joining FIVE. All policies are communicated to contractors, suppliers, and related staff as well to ensure adherence to the fundamental human rights standards and guidelines laid out by FIVE. Policies are hosted on the official website of FIVE and the intranet for ensuring ease of access to all employees.

## CONFLICT BETWEEN GUIDELINES AND LAWS

In case of conflicts between existing international human rights principles, the aforesaid guidelines above and applicable host-government legal requirements, the respective country's legal regulation will supersede. Any exceptions to the above will be documented separately with the exceptional approval of the Ethics and Compliance Committee.

## GUIDANCE AND REPORTING FOR EMPLOYEES

FIVE aims to create workplaces in which open and honest communications among all colleagues are valued and respected. Colleagues and workers have access to grievance reporting mechanisms and may report without prejudice, with anonymity respected.

The Company is committed to comply with applicable labor and employment laws wherever we operate. The Company also ensures employees are aware of the Human Rights Policy through training and an annual certification process.

Any employee who believes a conflict arises between the language of the policy and the laws, customs, and practices of the place they work, faces any conflict or issues which endangers their human rights or violates any existing guidelines, or who



has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with their immediate Supervisor or Line Manager. Employees can also report suspected policy violations through the hotline number or available registered email ID of –

Ethics and Compliance Email ID: [ethics@fiveglobalholdings.com](mailto:ethics@fiveglobalholdings.com);

Ethics Helpline Contact Number: **+971-42475270**

In case of an adverse human rights situation, FIVE shall take adequate measures by participating in effective operational-level grievance mechanism and resolving such complaints through investigation conducted by the Ethics and Compliance Committee.

All colleagues and third parties have an option to remedies to go forward and report such incidents to relevant local authorities in case of a severe infringement to any of the above fundamental human rights.

For detailed policy, refer '*Grievance Policy*' for the complaint management process.

## **PUBLIC REPORTING**

We report to the public on our human rights-related commitments, efforts, and statements, consistent with this Human Rights Policy, as part of our Human Rights Report and annual Sustainability Report. This reporting cross references the UN Guiding Principles Reporting Framework.

## **REVIEW**

The policy is reviewed by the Group Director of HR on an annual basis to make any amendments to this document.

In case you have any questions or concerns regarding this policy, please reach out to the Human Resources team or the Risk and Compliance team for assistance.