

Workplace Human Rights Policy

Global



Our Workplace Human Rights policy demonstrates our fundamental commitment to respecting internationally recognised human and labour rights within our employment practices. Element Six are committed to providing a work environment in which every employee is treated fairly, is respected, has the **opportunity** to contribute to business success and is supported to realise their full potential as individuals. This policy applies to all employees and contractors across E6, this includes permanent, contracted and temporary employees, as well as directors ('you'). Failure to comply with the principles set out in this Policy is a breach of Company policy and procedure and may result in remedial and / or disciplinary action.

Applicable Laws and Standards

- To protect the inherent dignity of our employees and contractors, we commit to respecting the principles set out below.
- It is understood that while these principles are subject to national laws; ethical best practice and internationally accepted human rights are to be adhered to as a minimum at all times.
- This policy must be read in conjunction with the Code of Conduct, any related HR policies and procedures, applicable domestic laws and regulations, and the United Nations and other International Standards as well as related International Labour Organization (ILO) Conventions (see page three for further details).

Human Rights Principles

Core Principles

- We treat our employees and contractors with fairness, equality, respect and dignity
- We strongly condemn and do not tolerate violence and harassment, including behaviour, practices or threats that result in or are likely to result in physical, psychological, sexual or economic harm.
- We provide access to grievance mechanisms to raise concerns regarding actual or potential breaches of human rights.
- We are committed to providing for or cooperating in remediation through legitimate processes where we identify that we have caused or contributed to adverse human rights impacts.
- We work to provide all employees with employment documentation in a language they understand, which sets out their work hours and work conditions including location, job title, pay and any potential reasonable and proportionate restrictions on the exercise of human rights.

Freedom of Association and Collective Bargaining

- Employees and employers will be free to form associations for the protection of their interests and to bargain collectively but will not be compelled to do so.
- We do not tolerate any interference or negative consequences (including being subject to any form of harassment, discrimination, or discipline) for exercising the rights to freedom of association and collective bargaining.

Forced Labour

- We do not tolerate any form of modern slavery including forced labour.
- We are committed to avoiding any practices that may result in forced labour including the retention of personal documents (such as passports and ID cards) and requiring the payment of fees by employees (including recruitment fees).
- We pay wages to our employees at regular intervals and overtime will be in accordance with local legislation.
- Employees have the right to freedom of movement and accordingly their movements will not be unreasonably or unnecessarily restricted.

Child Labour

- We do not employ persons under the age of 15, the age of completion of compulsory schooling, or the legal minimum hiring age under applicable laws and regulations, whichever is the highest. This includes internships, which are also required to be paid.



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- Short term and unpaid work experience is allowable for students aged 15+, subject to any applicable laws, regulations, and due process.
- No persons under the age of 18 will be employed in roles that may be hazardous to their health, wellbeing or safety, including any night work and work involving dangerous machinery, equipment or tools.
- We do not impede Colleagues under the age of 18 from attending school, educational and/or related recreational activities at agreed times.
- We have procedures in place in each of our operating countries to ensure that the age of prospective employees is verified prior to their employment and the requirements of this policy are adhered to where people under the age of 18 form part of our workforce.

Raising a concern

We encourage a culture where individuals can speak up. Employees and contractors are encouraged to raise potential breaches or areas of concern relating to this policy to their line manager, Human Resources or the Works Council (where applicable). Concerns and potential breaches can also be raised via YourVoice, a confidential and secure whistleblowing line which is independently managed to protect anonymity: www.yourvoice.debeersgroup.com.

We prohibit any form of punishment, disciplinary or retaliatory action being taken against anyone for raising or helping to address a genuine business conduct concern, including in relation to a breach of human rights. Retaliation is grounds for disciplinary action including dismissal.



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Applicable international laws and regulations:

- The United Nations Global Compact's ten principles; and
- International standards, including:
 - The International Bill of Rights (comprising the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights);
 - The United Nations Guiding Principles on Business and Human Rights; and
- The following related International Labour Organization Conventions:
 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
 - Forced Labour Convention, 1930 (No. 29);
 - Abolition of Forced Labour Convention, 1957 (No. 105);
 - Minimum Age Convention, 1973 (No. 138);
 - Worst Forms of Child Labour Convention, 1999 (No. 182);
 - Equal Remuneration Convention, 1951 (No. 100);
 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111); and
 - Eliminating Violence and Harassment in the World of Work, 2019 (No. 190)

Glossary / list of definitions and abbreviations:

Term	Explanation
Child Labour	The definition of 'child labour' set out in the United Nations International Labour Organisation Minimum Age Convention (138), and as set out below, must be adopted. 'A child is defined as any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. Child labour is therefore any work by a child younger than this age and any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, moral or social development.'
Employee	A direct employee of Element Six, either on a permanent or temporary contract.
Forced Labour	ILO Convention 29 defines forced or compulsory labour as 'all work or service which is exacted from any person under the menace of any penalty, and for which said person has not offered himself voluntarily'
Internships	Internships are employees on fixed term work placements and are paid. They are typically designed to give students or graduates an insight into a specific industry or career.
Modern Slavery	Modern slavery refers to situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour
Work Experience	Work experience is short term shadowing experience of around 5 days which is arranged in cooperation with the school. It is usually unpaid and is not a form of employment.

