**Human and Labour Rights Policy**

of

**Company X**

**[and**

**its subsidiary Company Y (if applicable)]**

**Version Day, Month, Year**

Table of **Contents**

Contents

[1. Introduction 3](#_Toc107932613)

[2. Human and Labour Rights in General 3](#_Toc107932614)

[3. Right to Freedom of Association 3](#_Toc107932615)

[4. Equal Opportunities 3](#_Toc107932616)

[5. Bullying and Harassment 5](#_Toc107932617)

[6. Grievance Procedure 6](#_Toc107932618)

[7. Health and Safety 8](#_Toc107932619)

[8. Environment 10](#_Toc107932620)

[9. Entry into Force and Amendments 10](#_Toc107932621)

# Introduction

1. The following Human and Labour Rights Policy (the **Policy**) sets out the principles to which Company X and Company Y (together the **Company**) is/are committed.

# Human and Labour Rights in General

1. The Company is committed to correct and fair working conditions and complies with all applicable national and international laws and regulations. We strictly reject all forms of child labour and have a zero-tolerance policy against forced labour, human trafficking, and modern slavery.

# Right to Freedom of Association

1. All employees of the Company (the “**Employees**”) have the right to freedom of association and collective bargaining. Employees must be granted the right to found organizations of their choice for the purpose of safeguarding employee rights, or to join employee organizations. Employees must be free to negotiate regarding working conditions, in particular wages. We do not discriminate against, harass, intimidate, terminate, or otherwise disadvantage Employees who take advantage of these rights.

# Equal Opportunities

## Our Values

1. The Company is committed to promoting equal opportunities in employment. All Employees and job applicants shall receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (the “**Protected Characteristics**”).

## What Is Discrimination?

1. We do not tolerate discrimination or harassment against other people including current and former Employees, job applicants, clients, investors, suppliers and visitors. This applies in the workplace, outside the workplace and on work-related trips or events including social events.
2. The following forms of discrimination are prohibited under this policy and are not permitted:

* **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or sexual orientation.
* **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
* **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
* **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.

1. Please note that questions related to certain Protected Characteristic may be necessary (e.g. nationality and residence permit to check your permission to work or information about your disability to make adjustments in the workplace or other medicinally necessary information that is essential for the performance of the job). However, such questions and information must always be justified by an objective reason.

## How We Avoid Discrimination

1. Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit and against objective criteria that avoid discrimination.
2. Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.
3. We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
4. We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

## Measures in the Event of Discrimination

1. We take a strict approach if Employees discriminate others or promote discrimination in our Company. Such behaviour may be sanctioned with disciplinary measures.
2. If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure.
3. There must be no victimization or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and may be sanctioned with disciplinary measures.

# Bullying and Harassment

1. The Company is committed to providing a working environment free from bullying and harassment and ensuring all staff are treated, and treat others, with integrity, dignity and respect.
2. We do not tolerate bullying or harassment that occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers bullying and harassment by staff (which may include consultants, contractors and agency workers) and also by third parties such as clients, investors, suppliers or visitors to our premises.
3. Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation. Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.
4. If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If informal steps are not appropriate, or have been unsuccessful, you should follow our Grievance Procedure.

# Grievance Procedure

## Complaint

1. If you wish to make a formal complaint about discrimination, bullying or harassment, you should submit your complaint to Person X, Function/Role within the organisation, whose role is to achieve a solution wherever possible. If the matter concerns that person, you should refer it to Person Y, Function/Role within the organisation.
2. As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

## Investigation

1. We will investigate complaints in a timely manner. Individuals not involved in the complaint or the investigation should not be told about it. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint. The investigation should be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.
2. We will also seriously consider any request that you make for changes to your own working arrangements during the investigation. For example you may ask for changes to your duties or working hours so as to avoid or minimise contact with the alleged harasser or bully.

## Action Following the Investigation

1. If the Company determines that the complaint has merit, prompt action will be taken to address it. The Company will take appropriate measures against or with the person concerned.
2. Any staff member who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to disciplinary measures.
3. Employees who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way may be subject to disciplinary measures.

## Confidentiality and Record-Keeping

1. Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary measures.
2. Information about a complaint by or about an Employee may be placed on the Employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

# Health and Safety

## In General

1. The Company is committed to providing a safe and healthy working environment, to complying with applicable health and safety laws, and to having operations, procedures, technologies and programs conducive to safety and health.
2. The Company’s goal is to minimize the exposure of our Employees, contractors and other visitors to our facilities to safety or health risks. To accomplish this objective, all staff are expected to work diligently to maintain safe and healthy working conditions and to adhere to proper operating practices and procedures designed to prevent injuries and illnesses.
3. Health protection, preventing sickness, and hygiene are of great importance for all Employees. Employees shall work with the Company in implementing and maintaining measures for health protection. Similarly, professional safety and accident prevention are very important, and also concern all Employees. Employees must follow instructions and directives given by Company management regarding of safety at work.

## Stress and Mental Health

1. We are committed to protecting the health, safety and wellbeing of our staff. Our work by nature and by its purpose involves responsibilities, uncertainty, time-sensitive tasks, a dynamic environment, challenging time zones and high degree of uncertainty, leading to stress. We recognise the importance of identifying and tackling the causes of work-related stress. We also recognise that personal stress, while unrelated to the workplace, can adversely affect the wellbeing of staff at work. We want to support the mental wellbeing of all our staff and will provide appropriate support for staff who are suffering from stress or mental ill health, on a confidential basis where appropriate, regardless of its source.
2. We will:

* Promote a culture of open communication. We want staff to feel confident that any concerns they raise about their work or working environment will be addressed.
* Provide training for all managers and employees in good management practices and stress management.
* Take account of stress and mental wellbeing when planning and allocating workloads and priorities. We will provide opportunities to discuss these through our appraisal processes.
* Ensure that in any workplace reorganisation our change management processes are designed to minimize uncertainty and stress.

## Addressing Work-Related Stress

1. If you believe you are suffering from work-related stress you should discuss this with your manager or supervisor in the first instance. If you feel unable to do so you should contact Person X, function/role within the organisation.
2. Once an issue affecting your health comes to the attention of your manager, supervisor or one of the board members, we will discuss with you what steps can be taken to address that issue. Those steps may include any of the following:

* A review of your current job role, responsibilities, workload and working hours. Adjustments may be agreed to these, on a temporary basis and subject to further review, where appropriate.
* Where it appears that stress has been caused by bullying or harassment, investigation under our Grievance Procedures.
* If you are on sickness absence, discussion of an appropriate return to work programme.

## Confidentiality

1. Information about stress, mental health and mental wellbeing is highly sensitive. Every member of staff is responsible observing the high level of confidentiality that is required when dealing with information about stress or mental health whether they are supporting a colleague or because they are otherwise involved in the operation of a workplace policy or procedure.

# Environment

1. The Company is aware of its social responsibility and thrives to undertake initiatives to promote greater environmental responsibility. As a Company we focus on minimizing any negative environmental impact and continuously improve within the environmental field towards a sustainable future and ask the same of our Employees.

# Entry into Force and Amendments

1. This Policy enters into force on month, day and year and supersedes any previous regulations.
2. This Policy may be amended by the management of the Company at any time with an advance notice period of at least one month at the beginning of a calendar month. The [CEO or Board Member] is responsible for communicating this policy to all staff, investors and other external stakeholders.

[Place], [Date]

Chairman of the Board CEO

[First Name, Last Name] [First Name, Last Name]

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  
[signature] [signature]