

HUMAN RESOURCES POLICIES

SIAT values its Human Resources and is committed to ensuring fairness, transparency and consistent treatment of all categories of workers. The company has developed the following policies to communicate its values and expectations to all workers. The company expects all its employees, business partners and associates to adhere to these policies.

HUMAN RIGHTS

SIAT is committed to preventing any form of human rights abuse as enshrined in the constitutions of the countries it operates in and the international human rights guidance¹. The group's key compliance focuses are:

- Respect for employees' and stakeholders' human rights. Prohibition of retaliation against human rights defenders and whistle blowers;
- Respect for local authorities: respect of the rights, cultures, customs and values of host communities²; and
- Prohibition of extra-judicial intimidation and use of mercenaries and para-militaries in our operations;

CODE OF BUSINESS CONDUCT

SIAT is committed to conducting all business, operations and transactions ethically as promoted by the United Nations³, by:

- Promoting transparency and complying with all applicable laws and legislation;
- Ensuring that all our actions are conducted with integrity and transparency in accordance with our values;
- Preventing corruption, bribery and fraudulent use of funds and resources;
- Avoiding situations involving actual or potential conflict of interest so that even the slightest doubt about integrity is not raised;
- Taking care that all confidential information is used for company business purposes only.

REPRODUCTIVE RIGHTS

SIAT aims to promote and protect the reproductive rights⁴ of all its workers, especially women by:

- Favoring their access to sexual and reproductive health information that will provide them with the tools to make informed choices conducive to their health;
- Respecting the rights of women during the maternity period with regards to maternity leave and breast feeding; and
- Ensuring that pregnant or breastfeeding women do not carry out work which exposes them to hazardous chemical products.

EQUAL OPPORTUNITY

SIAT is committed to ensuring that any form of discrimination based on race, ethnic origin, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, age or any other social condition, is prohibited⁵.

In the conduct of its business the company endeavors to:

- Operate a workable, flexible recruitment system that ensures that each person has equal access to employment based on merit, qualification, experience, skill, and knowledge;
- Communicate information on minimum entitlements for wages and conditions of employment to all employees in the appropriate language and ensure that they benefit from it;
- Give preference to members of local communities where candidates for employment are of equal merit;

- Ensure mechanisms are in place for identifying affected groups and responding to complaints of discrimination; and
- Protect migrants⁶ from abusive employment and to treat them fairly.

VIOLENCE AND HARASSMENT

SIAT prohibits all forms of workplace violence and harassment, particularly sexual harassment⁷, whether engaged by workers or other stakeholders operating within SIAT Estates. Harassment is defined as unwelcome words, conduct or actions that are offensive, embarrassing, humiliating or demeaning to a worker or group of workers. Workplace violence is the exercise or attempt of physical force by a person against another. The company will ensure that:

- Workers are aware of, and understand that acts of violence or harassment are considered a serious offence for which necessary action will be imposed;

- Those subjected to acts of violence or harassment are given available recourse to pursue a complaint;

SIAT is committed to investigating reported incidents of violence and harassment in an objective and timely manner, taking necessary action; and providing appropriate support for victims.

FREEDOM OF ASSOCIATION

SIAT respects and supports the right of all categories of workers to freedom of association and to collective bargaining. The company commits to implementing this policy by:

- Allowing all workers, without distinction, to form and/or join any kind of association⁸ of their own choosing;

- Recognizing workers' associations as partners for the purpose of reaching consensus relations between the company and its workforce.

- Allowing workers associations to conduct their activities without interference; and

- Not tolerating intimidation, reprisal or discrimination of any kind against association members or representatives or those advocating membership for the association.

CHILD PROTECTION

SIAT subscribes to a zero tolerance policy of child labour or exploitation of children in any of its operations.

The company commits to securing a better future for children by:

- Only employing workers who can prove that they are above 18 years of age;

- Immediately discontinuing the employment of a child in the event of an occurrence of child labour being discovered;

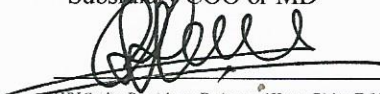
- Discouraging workers whose own children are encouraged to work with the family when they are of school age and/or doing unreasonable tasks for their capabilities;

- Encouraging all workers to school their children; and

- Refraining from engaging in business with partners who resort to using child labour in their operations.

SIAT provides mechanisms that respect anonymity, to identify, prevent, mitigate and address human rights issues and impacts. For more information please contact the HR Unit and visit our website: www.siat-group.com

Subsidiary COO or MD



M. Vandebecq

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¹ UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work

² UN declaration on the right of indigenous people

³ United Nations Convention Against Corruption (2000)

⁴ Reproductive rights are defined as legal rights and freedom relating to reproduction and reproductive health, for couples and individuals, as well as freedom to decide freely and responsibly the number, spacing and timing of children

⁵ ILO Conventions on non-discrimination and discrimination

⁶ ILO Convention Migrant workers

⁷ Guide on Prevention of Sexual Harassment in the Workplace

⁸ ILO convention Freedom of Association and protection of right to Organi.

