

HUMAN RIGHTS POLICY

communisis

AN OSG COMPANY

Contents

PURPOSE	3
SCOPE	3
POLICY STATEMENT	3
WHAT WE WILL DO	3
LEADERSHIP	3
PROTECTING THE RIGHTS OF CHILDREN AND YOUNG PEOPLE	3
TACKLING MODERN SLAVERY	4
PREVENTING BRIBERY AND CORRUPTION	4
ENSURING A SAFE AND HEALTHY WORKPLACE	4
FREEDOM OF ASSOCIATION AND EMPLOYEE REPRESENTATION	4
REASONABLE WORKING HOURS	4
HOW WE WORK WITH SUPPLIERS	4
WE EXPECT THAT YOU WILL	5
COMMUNISIS COMMITS TO	5

PURPOSE

Communis has developed this policy to ensure all colleagues and stakeholders embed and respect human rights throughout all operations and interactions. The importance we place in protecting human rights will ensure consistent and fair treatment for all in the organisation.

SCOPE

This policy applies to all permanent, fixed term and temporary employees working for Communis under a contract of employment from any company within the Communis Group.

This policy also applies to workers who are employed by a third-party agency or who are deemed to be a self-employed contractor and part of how we interact with all stakeholders, internal and external.

POLICY STATEMENT

At Communis we are committed to ensuring that the UN Guiding Principles on Business and Human Rights and the International Labour Organisation (ILO) fundamental conventions on labour rights are at the core of all interactions with people across our entire operation and supply chain. This policy sets out our commitment and how we will work to ensure those human rights are protected in our interactions with each other, our clients and customers, our suppliers and people within those communities and organisations.

WHAT WE WILL DO

LEADERSHIP

- ▶ Every colleague in Communis has both the responsibility and accountability for ensuring that we conduct ourselves and our business that is consistent with our commitments set out within this policy. This is embedded within our cultural beliefs, values, and behaviours
- ▶ We consider any and all risks to our people and those working within our supply chain as risks to our business and these are managed as per our risk management framework and approach
- ▶ All colleagues and those that work with us will be made aware of and provided with guidance and training in relation to this policy, the standards and relevant procedures that are relevant to their role.

PROTECTING THE RIGHTS OF CHILDREN AND YOUNG PEOPLE

- ▶ Communis is committed to not using child labour and complies with all relevant laws in this regard. We will work with our supply chain to ensure that this commitment is also upheld by our partners
- ▶ Working to applicable laws and regulations we are supportive of legitimate workplace apprenticeships, internships and other similar programmes.

TACKLING MODERN SLAVERY

- ▶ Communis will not use forced, bonded or compulsory labour (including slavery and servitude). Workers are not required to lodge 'deposits' or identity papers with us and can leave after giving reasonable notice, with all wages owed to be paid. This includes a zero-tolerance approach to human trafficking.
- ▶ You can find out more about how we are working to identify and remove any instances of modern slavery in our Modern Slavery Statement available on our [website](#).

PREVENTING BRIBERY AND CORRUPTION

Communis adheres to and complies with the UK Bribery Act 2010 and any other relevant legislation in the jurisdictions in which Communis operates. Communis expect employees and others acting on the Company's behalf to act with honesty, integrity and transparency. Our Bribery Policy outlines our expectations and we will not pay bribes and will ensure that the company's services are not used to abuse human rights.

ENSURING A SAFE AND HEALTHY WORKPLACE

Our vision is to maintain a safe environment for all employees, contractors and visitors, and our ultimate aim is that no-one is injured, or made ill, as a result of working at or visiting our sites.

We all have a role to play in making sure that Communis reaches our goal of Zero Harm physically or mentally. It is crucial that everybody is involved in the continual development of a safety culture within Communis that builds on our experiences and positively improves our safety behaviour, in accordance with our related policies and procedures.

FREEDOM OF ASSOCIATION AND EMPLOYEE REPRESENTATION

Communis is committed to consulting with and seeking our workers views and respect their right to join or not to join a trade union. We will ensure that there are no barriers in place to prevent anyone joining an organisation of their choice to represent them in line with local legislation. Where local rights to Collective Bargaining exist, it will be allowed.

REASONABLE WORKING HOURS

Our set pay levels will not be lower than that required by local law or, in the absence of a law, the level paid generally within that industry.

We are committed to paying a fair wage where that has been defined and ensuring equal pay rates for roles regardless of gender, race, or other characteristics. Annually we publish a Gender Pay Gap Report which can be found on our [website](#).

HOW WE WORK WITH SUPPLIERS

Communis outline expectations and the standards we expect our suppliers to comply with, working with them to ensure they operate in accordance with this policy upholding the principles of human rights in their operations and supply chains.

Our standard supplier terms and conditions and related policies and procedures set out these requirements. More information on how we work with our supply chain partners on related matters can be found in our Modern Slavery Statement, available on our [website](#).

WE EXPECT THAT YOU WILL

- ▶ Treat everyone you interact with fairly, protecting their right to work in an environment free from fear or want, upholding their freedom to express their independent beliefs
- ▶ Ask for support and guidance, if you face a situation, or circumstances where you are uncertain
- ▶ Take action and speak out if you have a concern that someone's human rights are not being respected, or you believe someone has or is being unfairly discriminated against, bullied, harassed or treated unfairly in a way that does not comply with our policies, charters or Code of Ethics
- ▶ Our Whistleblowing Policy sets out the channels available to you to do so and no action will be taken against you if you report a genuine concern.

COMMUNISIS COMMITS TO

- ▶ Ensuring that these principles are reflected throughout all our employment practices and terms and conditions of employment and additionally the contracts and interactions we have with all stakeholders
- ▶ As part of our risk management framework, we will regularly review and where necessary update the relevant policies and procedures to maintain the focus on human rights
- ▶ Continue to work with external groups and advisory bodies so that we keep up to date with progress being made and maintain awareness of any emerging issues and improvements in practices.

Prepared by	 Ricky Alfred, Director of Responsible Business 3/11/2021		
Authorised by	 Andrew Neal, Chief People Officer 3/11/2021		
Issue	001	Document Reference No	HRP035
Date	3/11/2021	Classification	Proprietary
Owner	Human Resources	Review Date	2/11/2022

