

Azule Policy

Human rights and modern slavery

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Foreword

The document was developed by the Legal and Business Compliance team, is owned by the Legal and Government Affairs Director and issued by the Board of Directors.

Introduction

There are many ways in which human rights issues might be associated with our activities, including impacts on people's livelihoods, access to water, land and resources, workforce rights – including modern slavery –, and the actions of the security forces who protect our sites. Our actions and operations can also bring about major benefits and improvements to individuals, communities, and society.

We want to contribute to sustainable development and to support the delivery of the UN Sustainable Development Goals. AZULE recognizes the importance of a just transition as envisaged by the Paris Agreement – one which delivers decent work, quality jobs and supports the livelihoods of local communities.

To deliver our business goals we must continue to work to a consistent and high set of standards, including in respect to good human rights practices, wherever we operate in the world.

1 Scope and exclusions

- 1.1 This Human Rights and Modern Slavery Policy applies to all AZULE wholly owned entities and AZULE operated JVs.
- 1.2 The document should be updated on a regular basis
- 1.3 Through the conduct of their activities, our business partners – including non-operated JVs and Contractors – can have adverse impacts on human rights. For this reason, we want to work with business partners that share our commitments to human rights, safety and ethics and compliance and we seek to use our leverage, consistent with the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises and other relevant standards to encourage them to act in a manner consistent with the principles underlying the commitments set out in this policy.
- 1.4 Azule shall report annually to stakeholders on the implementation of this policy in a number of relevant disclosures, including our sustainability report, slavery and human trafficking statement and annual report on implementation of the Voluntary Principles on Security and Human Rights.

2 Required References

The following document is referred in this policy:

- Azule Code of Conduct
- International Bill of Human Rights
- International Labour Organizations' Declaration of Fundamental Principles and Rights at Work

- UN Guiding Principles for Business and Human Rights
- OECD Guidelines for Multinational Enterprises and the ten principles of the United Nations Global Compact

3 Terms and definitions

No terms and definitions.

4 Symbols and abbreviations

No symbols and abbreviations.

5 Azule Requirements

- 5.1 We conduct our business in a manner that respects the rights and dignity of every human being complying with all legal requirements.
- 5.2 We respect internationally recognized human rights as set out among others in the International Bill of Human Rights and the core labour standards recognized by the International Labour Organization (ILO), as enshrined in the ILO Declaration on Fundamental Principles and Rights at Work.
- 5.3 We recognize our responsibility to respect human rights and avoid complicity in human rights abuses, as stated in the UNGPs and reiterated in the human rights chapter of the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.
- 5.4 In meeting our responsibility to respect human rights, we consider relevant international human rights standards, including UN instruments establishing or elaborating on the rights of specific groups. We respect the rights of individuals belonging to groups or populations which may be particularly vulnerable to adverse impacts, including: indigenous people; women; national or ethnic, religious and linguistic minorities; children; LGBTQIA+ people; people with disabilities; and migrant employees and their families.
- 5.5 Consistent with our commitment to respect ILO core labour standards, we respect freedom of association and collective bargaining. We support the elimination of all forms of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation, including unfair wage.

We treat everyone who works for Azule fairly and without discrimination. Our employees and Contractors are entitled to work in an environment and under conditions that respect their rights and dignity, free from discrimination and from any form of workplace violence or harassment.

We will abide by applicable domestic laws concerning non-interference in our employees' right to form or join a trade union or to bargain collectively, as well as their right not to do so. Where our employees wish to be represented by trade unions or works councils, we will co-operate in good faith with the bodies that our employees collectively choose to represent them. In situations where freedom of association is restricted, we will be open to and supportive of alternative means of worker representation and engagement.

- 5.6 We respect the human rights of people in communities that may be affected by our activities respecting the International Bill of Human Right, ILO's Indigenous and Tribal Peoples Convention (ILO169), the UN Declaration on the Rights of Indigenous People (UNDRIP)
- 5.7 We endorse the Voluntary Principles on Security and Human Rights (Voluntary Principles) and we are committed to implementing them, as the global standard for the provision of responsible security in our industry.
- 5.8 We seek to make contractual agreements with our business partners and Contractors that require them to respect internationally recognized human rights in their work with and for Azule, consistent with the commitments in this policy, as appropriate to the nature of such work. We have standard contract clauses to support this.
- 5.9 We will meet our responsibility to respect human rights by implementing the UNGPs and OECD Guidelines for Multinational Enterprises incorporating these principles into the internal processes, policies or guidance that support our business activities. This includes: training and awareness campaigns; conducting human rights due diligence – as described by the UNGPs – through our risk and impact management processes; and providing access to remedy. By doing this, we aim to enable our businesses to identify, prevent and mitigate potential impacts on human rights.
- 5.10 Business partners and Contractors
- 5.10.1 Azule Code of Conduct reinforce and support our commitment to respect human rights.
- 5.10.2 Our expectation is that our business partners and contractors should respect human rights and meet the responsibilities set out in the UNGPs and OECD Guidelines.
- 5.10.3 The expectations also ask that our Contractors communicate those expectations to their employees, suppliers and business partners who may provide goods or services to us.
- 5.10.4 Our labour rights and modern slavery principles (described in Annex I) reiterate that we expect our Contractors and joint ventures (JVs) to respect employees' rights, in line with the ILO's Core Conventions on Rights at Work. We set out 13 principles to assist our businesses, Contractors as they work to check performance on this expectation.
- 5.11 The rights of our workforce. Respect for our employees' human rights is integral to our recruitment, management and diversity and inclusion processes. We provide guidance to our businesses and projects on respecting the rights of employees and screen our major projects in the development stages, including with respect to labour rights, prevention of discrimination, prevention of gender-based violence as well as workplace violence and harassment, to help identify and prevent potential impacts.
- 5.12 Human rights and communities
- Where people in local communities may be affected by our activities, we seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them. To support this, we provide guidance to our

businesses and projects on engaging with local stakeholders, managing the process of receiving and responding to community complaints or concerns.

5.12.1 Water

We respect the rights to water and sanitation for people who could potentially be affected by our activities, including our employees, contractors and neighbouring communities. The availability of water in areas where we work varies greatly, so we consider local conditions, such as water stress and scarcity, in order to understand and mitigate our impacts. We first seek to avoid any impacts and, if not feasible, we adopt mitigation measures that remedy the impact. We review water risks in our portfolio on an annual basis, considering the local availability, quantity, quality and regulatory requirements.

5.12.2 Our approach to the resettlement of communities

We avoid involuntary resettlement of communities and/or individuals, but if this is not possible, where we need to access or acquire land for our operating activities, we ensure this is aligned with the principles outlined in International Finance Corporation (IFC) Performance Standard 5.

5.12.3 The rights of indigenous peoples

We respect the rights of indigenous peoples (IPs) and, where they may be affected by our business activities, our approach and actions aim to be consistent with the principles set out in international standards for consultation and engagement with IPs, including the ILO's Indigenous and Tribal Peoples Convention (ILO169), the UN Declaration on the Rights of Indigenous People (UNDRIP). Our guidance references IFC Performance Standard 7 and recognizes that it is important that we identify and consult with IPs, seeking to apply the principles of free, prior and informed consent (FPIC) where practical, ideally prior to the commencement of activities.

5.13 Management system of human rights impact

5.13.1 We work to identify, assess and address the human rights impacts of our operations and relationships, in consultation with those who may be affected. We work to embed human rights into environmental and social impact assessments, or undertake independent assessments of potential adverse human rights impacts, as appropriate. With a view to continuous improvement, we track the implementation of adequate measures and their results.

5.13.2 We will obtain independent third-party assessments of selected sites and business activities on a risk-prioritized basis to assess their conformance with this policy.

5.13.3 We conduct assessments of the risk of modern slavery and human trafficking, both for our own business activities and activities of our Contractors, focusing our efforts where we believe risks to the rights of our workforce are higher.

- 5.13.4 All operating sites are required to conduct security risk assessments, through which they consider security-related human rights risks, and to develop action plans, consistent with the Voluntary Principles, to address any they identify.
- 5.13.5 We disclose our performance on human rights issues and we communicate to our stakeholders how human rights impacts are addressed.
- 5.14 Grievance mechanisms and remediation
- 5.14.1 Seek clarification and raise concerns where you see them through our speak-up channels defined in the Code of Conduct
- 5.14.2 In respect of our activities, we will not tolerate or contribute to attacks, or physical or legal threats, against those safely and lawfully exercising their human right to freedom of expression, peaceful protest or assembly, including where they are acting as human rights defenders (HRDs), or against workers seeking to exercise their right to freedom of association.
- 5.14.3 We seek to make grievance mechanisms available to our workforce and local communities. We do not impede access to state-based judicial processes. We do not require individuals or communities to permanently waive their legal right to bring a claim through a judicial process as a precondition of raising a grievance through an Azule grievance mechanism.
- 5.14.4 In line with this policy and the requirements of our Code of Conduct, our grievance mechanisms in line with UNGP 31 include recording and reporting of grievances raised, including in relation to human rights, and actions taken to address them.
- 5.14.5 Where Azule identifies that we have caused or contributed to adverse impacts on the human rights of others, we provide for or co-operate in the mitigation or remediation of the adverse impacts through legitimate processes intended to deliver effective remedy while not preventing access to other forms of mitigation or remediation, if justified. This may include co-operating in good faith in the provision of remedy through state-led mechanisms, such as the OECD national contact points. Where adverse impacts are directly linked to our activities through our business relationships, we will support our business partners in the remediation of those impacts through their own grievance management processes, or support collaboration to provide for non-judicial remediation through third parties.

- 5.15 As a global business and a long-term investor, we value open societies, characterized by the rule of law, good governance and respect for civic freedoms. In respect of our activities, we will not tolerate or contribute to attacks, or physical or legal threats, against those safely and lawfully exercising their human right to freedom of expression, peaceful protest or assembly, including where they are acting as human rights defenders (HRDs)^a, or against employees seeking to exercise their right to freedom of association. We respect the human rights of HRDs and recognize the important role they can play in advancing the fulfilment of universally recognized human rights in the societies where we operate. Where we believe it could be beneficial to do so, we may choose to act in coordination with other stakeholders and, as appropriate to the nature of any leverage available to us, to support HRDs in the exercise of those human rights.
- 5.16 Co-operation and multi-stakeholder initiatives
- 5.16.1 Azule [shall] participate in international initiatives that are intended to support human rights, including: the UN Global Compact; the Extractive Industries Transparency Initiative and the Voluntary Principles on Security and Human Rights. Azule believes that multi-stakeholder efforts are an effective means of promoting reasonable standards for human rights practices at an operational level and will [continue] to take a constructive and progressive role in human rights-related multi-stakeholder initiatives.
- 5.16.2 Azule supports and [shall] implement the Voluntary Principles as a framework for operational due diligence and management of security-related risks to the human rights of people in communities near our sites. The Voluntary Principles inform the way we work with public and private security forces who protect our facilities, to reinforce respect for human rights. We also provide guidance and training to our businesses on implementation of the Principles.
- 5.17 We will make sure that our communication with governments, regulatory bodies, public authorities and any other relevant stakeholders, is consistent with our human rights commitments, as stated in this policy.
- 5.18 Consistent with the UNGPs, in those instances where there is a conflict between a legal requirement and this policy, we seek to apply the higher standard while complying with all applicable laws. We do not follow customs of any kind that would constitute a breach of our code of conduct.
- 5.19 Governance
- 5.19.1 The responsibility and accountability for the management of human rights issues extends across AZULE. This includes the board-level safety, environment and security assurance committee, which has oversight of human rights, including review of our performance in managing modern slavery risks. At the executive level, the group operations risk committee reviews progress on human rights implementation. Business functions, like HR from an employee perspective and Procurement from a contractor perspective, and local operations are responsible for implementing actions to help meet the commitments in this policy and all relevant group requirements.

5.19.2 The human rights working group, which is made up of senior representatives from across the business, considers current and emerging human rights risks of potential group significance.

Annex A : Labour Rights and modern Slavery Principles

Azule is committed to respecting human rights and workers' rights, in line with International Labour Organisation Core Conventions on Rights at Work, and expect our Contractors and joint ventures we participate in to do the same.

Our expectation is that employees in our operations, joint ventures and supply chains are not subject to abusive or inhumane practices, such as child labour, forced labour, trafficking, slavery or servitude, discrimination, violence or harassment. The below principles are intended to assist our businesses as they work to check performance on this expectation, including with our Contractors.

1. **Terms and conditions:** Employees have clear, written employment terms and conditions before deployment in a language they understand, and in line with terms at point of recruitment, which are consistently upheld.¹
2. **Legal status:** Employees are legally authorized to work for their employer and possess the necessary visas, work permits, and any similar legal documentary requirements.
3. **Protection of Young Persons:** Individuals below the legal minimum working age are not hired, either directly or indirectly.
4. **Fees:** Employers are responsible for all costs and fees associated with recruitment of employees regardless of the manner or location of the imposition or collection of the fee. Employees do not pay recruitment or other fees² irrespective of the method of payment or by whom it was collected. Employees do not suffer unlawful pay deductions, to secure a job or for continued service, nor disproportionate monetary penalties as a disciplinary measure.
5. **Passports and papers:** Worker passports, travel identification or work authorization papers are not withheld.
6. **Free movement:** Employees are free to terminate employment upon notice in accordance with applicable laws. Workers are not prevented from leaving worksites or employment, except for reasonable safety or security reasons.
7. **Pay:** Employees are paid on time, as per employment terms. Wages, benefits and overtime rates meet, as a minimum, legal requirements.
8. **Working time and rest:** Employees are not required to work unreasonable hours, hours beyond legal limits, or without appropriate breaks and defined leave periods in accordance with applicable laws.
9. **Grievance:** A grievance process is in place by which employees can make complaints, including anonymously, and receive appropriate responses and timely updates on the status of concerns. Concerns may be raised through any process (formal or informal) without fear of retaliation, discrimination or harassment.
10. **Working conditions and accommodation:** Employees enjoy a safe, healthy and hygienic working environment. Access to clean toilet facilities, potable water, and if

¹ Contracts as a minimum contain the following elements: employer, nature of work, expected regular working hours, including overtime hours, rates of pay, lawful wage deductions, pay cycle, benefits, including overtime, leave entitlement and rest days, provisions for repatriation.

² Fees include: payments in connection with recruitment, termination, placement, visas or work permits, government levies, medical examinations, airfare or costs of other mode of international transportation, security deposits and bond, transportation from the airport or disembarkation point to dormitories or facility.

appropriate, sanitary facilities for food storage are provided. Accommodation and food, where provided, is clean, safe and meets the basic needs of the employees.

- 11. Discrimination and harassment:** There is no discrimination in employment practices based on race, caste, national origin, religion, age, disability, sex, gender, marital status, sexual orientation, union membership or political affiliation or any other characteristic prohibited by law. Violence, abuse or harassment, or other forms of intimidation, whether physical, psychological or sexual, or the threat thereof, are not tolerated.
- 12. Freedom of Association** and collective bargaining: In conformance with local law, where employees choose to be represented by trade unions or works councils, employers will cooperate in good faith and in accordance with applicable laws, with the bodies that the employees collectively choose to represent them.
- 13. Controls:** Contractors and non-operated joint ventures develop and maintain adequate processes and controls to implement, communicate, monitor and remediate identified deficiencies with regard to the above, including in their supply chains.
- 14.** Where there is a difference between these principles and a legal requirements or collective agreements, seek to apply the provision which affords greater protection to employees, without violating domestic law or the collective agreements.