
HUMAN RIGHTS POLICY

1. Mission Statement

We respect the human rights of all individuals impacted by our operations, including employees, contractors and external stakeholders. Wherever we operate, we seek to avoid causing or contributing to human rights violations and to facilitate access to remedy. While governments have the primary responsibility to protect against human rights violations, we understand and accept our responsibility to respect human rights.

We consider “human rights” to be all internationally recognized human rights in the International Bill of Human Rights and the International Labour Organization (ILO) Declaration of Fundamental Principles and Rights at Work.

2. Our Approach

In fulfilling our mission, we are guided by several principles that help define our approach:

- We are committed to and always strive to act in accordance with the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the Voluntary Principles on Security and Human Rights.
- We do not tolerate violations of human rights committed by our employees, affiliates, or any third parties acting on our behalf or related to any aspect of one of our operations.
- We do not tolerate the use of child labour, prison labour, or any form of forced labour, slavery or servitude.
- We believe in fair employment practices and in a workplace in which all individuals are treated with dignity and respect. We do not tolerate discrimination against individuals on the basis of race, colour, gender, religion, political opinion, ethnicity, age, nationality or social origin, sexual orientation, or union membership.
- We aim to pay all employees and contractors fairly. We will enforce working hours to the best of our ability aligned with ILO standards, and provide fairly compensated overtime and pay for periodic holidays and time off.
- We respect the freedom of expression and right to associate of our employees and contractors, including their right to establish and to join organizations of their own choosing to bargain collectively and advance their occupational interests without our previous authorization or unreasonable interference.
- We do not tolerate threats, intimidation, or attacks against human rights defenders.
- In our relationships with host governments, contractors and third-party service providers, we do our utmost to avoid being complicit in adverse human rights impacts, including benefitting from the human rights violations caused by others.
- We monitor and try to continuously improve our human rights performance.

3. Steps We Take

To try and meet those commitments, we will aim to take several steps:

- Develop and implement supporting policies, procedures, training and internal reporting structures to embed this Policy throughout our company.
- Provide training on our human rights expectations to all new employees and all relevant existing employees.
- Provide a safe and healthy workplace for all staff, contractors and subcontractors.
- Follow the Voluntary Principles on Security and Human Rights in our dealings with public and private security providers, local communities and potential victims of human rights violations.
- Comply, and demand that all suppliers and contractors comply, with all national laws, the International Bill of Human Rights, and the ILO Core conventions.
- Conduct human rights due diligence for all new projects and significant modifications to existing operations where there is the potential for negative human rights impacts, and seek to employ reasonable measures to mitigate those impacts.
- For relevant suppliers and third-party service providers, perform reasonable due diligence, insist that human rights terms and conditions be included in contracts (including compliance with this Policy), and require periodic human rights reporting, certifications and/or training.
- Promote human rights by contributing to public debate, supporting international agreements and commitments, and identifying opportunities to constructively engage on human rights issues relevant to the countries in which we operate.
- Only employ people above the minimum employment age set by national law or by ILO Convention 138, whichever is the higher. We will avoid employing individuals below 18 years of age in work that is likely to harm their health, safety or morals.
- Promote fair competition, including respect for property rights.
- Respect the history, culture and traditional ways of indigenous peoples, their standing as distinct, self-determining peoples with collective rights, and their interests in land, waters and the environment.
- Meaningfully engage with the local communities and other stakeholders affected by our operations to create and maintain transparent relationships built on mutual respect and trust.
- Establish and maintain a grievance mechanism for human rights complaints to be reported and addressed without any prejudice to the aggrieved person(s). We will report publicly on how complaints have been managed.
- Prevent, mitigate, and, where appropriate, remedy negative human rights impacts that are caused, or contributed to, by our company. In situations where we are directly linked to negative human rights impacts because of activities in our value chain, we will seek to use our leverage to prevent or mitigate those impacts.
- Conduct periodic audits and reviews at different sites, of different operating units, and of different contractors, to give us confidence that we are meeting the letter and spirit of this

Policy. We may conduct those audits ourselves, or use external third parties. Where appropriate, we will establish performance improvement action plans to respond to the findings of these audits and reviews.

- Communicate this policy to our employees, partners, contractors and sub-contractors and make it available to the public.
- Report on our performance against our human rights objectives and targets.

4. Scope of Policy

The Policy is applicable to our entire workforce of Boroo Group, including senior executives, financial officers, contractors and members of the Board of Directors, at every site that we operate. Certain of our affiliates and joint ventures, maintain their own distinct human rights policies and approaches, however we will use all rights and powers at our disposal as significant shareholders to achieve policies that will, in principle, align with this policy.

HUMAN RIGHTS POLICY - APPENDIX A

FREQUENTLY ASKED QUESTIONS

1. What is a “human right”?

For purposes of our human rights approach, the term “human rights” includes rights to:

- Life;
- Physical safety;
- Own and enjoy property;
- Fair and appropriate treatment in the workplace and in society, including protections for children;
- Fair treatment in the legal system;
- Associate with others for peaceful and lawful purposes;
- Practice and enjoy one’s culture, nationality and religion;
- Maintain individual thoughts and reasonable expression;
- Privacy and familial rights;
- And other rights as spelled out in relevant policies and procedures.

2. What kinds of activities constitute human rights violations?

The kinds of activities vary greatly and can include murder, extrajudicial killing, and physical abuse such as torture, beatings, rape, assault, kidnapping, or attacking peaceful lawful protestors. Violations of rights in the legal system, such as abuse in prison, arbitrary arrest, or the denial of a fair trial, or related to labour, such as child labour, forced labour, or labour trafficking, as well as certain workplace conditions, can all be violations of human rights. Activities violating human rights can also include property related issues, such as forced evictions, denying individuals the right to own or enjoy property, land grabbing, or denial of access to water in certain situations. Measures that prevent people from practicing their religion or having a family, or discriminating against people based on their nationality, sex, race, or other characteristics can also violate human rights.

3. What is the difference between a human rights violation and a domestic legal violation?

There are differences between human rights violations and domestic legal violations. Human rights violations, for purposes of our approach, are defined by international standards, and tend to involve rights that most countries around the world agree upon. Domestic legal violations normally are broader in scope than human rights violations; that is, human rights generally are a subset of domestic legal provisions. In most instances, conduct that constitutes a human rights violation will also violate domestic laws. Under our policies and procedures, information that could suggest human rights violations or domestic legal violations must be reported.

4. What does it mean to be complicit in a human rights violation?

Complicity can mean different things, depending on the circumstances. In many locations, knowingly providing practical assistance to a legal violation defines complicity. Our goal is to avoid contributing to, encouraging, benefitting from or facilitating any human rights violation, and to take steps to help others acting on our behalf do the same.

5. What are the penalties for human rights violations?

The legal penalties for committing human rights violations vary. The penalties largely are defined by domestic legal codes, and so will depend on the countries whose laws may apply, and the nature of the incident. However, most human rights violations bring the potential for severe penalties, which, depending on the circumstances, can apply to individuals and companies. For individuals, the penalties can include lengthy jail terms and harsh monetary fines. For companies, the penalties can include fines, loss of licenses, and other measures. For employees, if you are complicit in human rights violations or serious criminal acts, you should expect your employment to be terminated. Given the seriousness of human rights violations, employees who either fail to report human rights violations about which they have direct knowledge, or who hinder investigations into human rights violations by, for instance, misleading investigators, also should expect to be terminated. Our third-party contractors and suppliers likewise will be expected to avoid committing or being complicit in human rights violations, to report human rights violations of which they are aware, to avoid hindering human rights investigations, and to institute appropriate remedial actions where they are complicit in or otherwise commit a human rights violation.

6. How are human rights obligations enforced?

There are different enforcement mechanisms in different locations. First, host governments may take action. Second, most countries have laws that can apply outside of their borders, and these sometimes cover human rights. That can include countries where the victim or perpetrator lives or is a citizen, or even countries that may not have an obvious connection to the event. These countries, too, may take action. Third, the international community has a web of enforcement mechanisms that may apply, depending on the facts.

Finally, we also may take commercial action in the face of actions that implicate human rights concerns, whether through discipline of employees, re-evaluation of contracts, or other means.

7. If I have questions about whether something may constitute a human rights violation under our policy, whom should I contact?

We have resources to provide guidance on whether an action could violate relevant human rights or domestic laws. But you always should consider contacting your supervisor, the Human Resources department, the Country Executive Director, the General Manager, any In-House Legal Counsel, any Compliance Personnel, or the Office of the General Counsel. If you have any doubts about whether an incident may implicate human rights, err on the side of reporting.

8. How do I know if something is a human rights violation that should be reported?

It is not important whether you know that something is, or is not, a human rights violation. If you hear information suggesting that conduct by an employee or third party could violate our Code of Business Conduct and Ethics, our Human Rights Policy, or other relevant policies, report the conduct regardless of whether you know or believe it is a human rights violation. If you hear information suggesting that conduct by an employee or third party could be part of any type of legal violation, or that someone's legal rights were violated in any way, report the conduct regardless of whether you know or believe it is a human rights violation. We do not expect you to report what law or what human right may have been violated. We do expect you to report information related to conduct that seems wrong or improper.

9. How much information must I hear or learn about to report it? Is a simple rumor that I hear enough to report?

Given the serious nature of the issues, a simple rumor of misconduct that you don't know to be true or untrue is enough to report. There is no minimum threshold for relevant reportable information. Rumors can be examined to assess their truth. Other individuals also may report relevant facts that may shed light on a rumor. Any information that could implicate a human rights issue, or a violation of the law, should be reported. Do not try to apply any subjective judgment to determine whether the rumor is or is not credible.

10. What information should I report?

Report whatever factual information you have gathered. In particular, it is important to note the identities of relevant individuals, whether they are witnesses, victims, or perpetrators. It also is important to include details about any incidents, including relevant times and locations, to permit further investigation. We do not expect you to identify rights that you think may have been violated, but only what you may have perceived – that is, what you may have seen, heard, or read. Note that we may, depending on the situation, report information about human rights violations to relevant government agencies.

11. What may happen if I do not report information of a potential human rights violation?

An individual's failure to report information related to a crime can, in some circumstances, itself violate the law. We believe it is critical to know about and review human rights concerns, and the consequences to us for failing to do so can be severe. And we may not be excused from failing to know about or look into human rights or other legal issues because we do not learn of them. So, if an employee fails to report a human rights violation or serious crime about which they have direct knowledge, the employee should expect to be terminated – just as an employee who is complicit in a human rights violation or serious crime should expect to be terminated. If an employee misleads or hinders investigators looking into possible human rights violations or serious potential crimes, the employee should expect to be terminated.

For contractors, if you or any of your employees commit or are complicit in a human rights violation or serious crime, you will be expected to take appropriate remedial action, and/or your contract may be re-evaluated. If you or any of your employees know of a human rights violation or serious crime by a third party and fail to report it, you will be expected to take appropriate remedial action, and/or your contract may be re-evaluated.

If you or your employees hinder or mislead investigators making inquiries into human rights violations or serious crimes, you are expected to take appropriate remedial action, and/or your contract may be re-evaluated.

12. Are there any exceptions to reporting potential human rights violations (e.g., are there instances where I should not report information I hear about a potential human rights violation)?

There are no exceptions to reporting.

13. Can I report anonymously?

Yes, reports through the Compliance Hotline can be anonymous. It is important to understand that there will be no adverse employment consequences for people who timely report information in good

faith related to possible human rights concerns. We will take reasonable measures to try to protect individuals who report in good faith, in a timely manner, from reprisals by third parties.

14. How will human rights violations be investigated?

Reviews of possible human rights violations may be conducted in different ways, using internal or external resources. Findings of serious human rights violations will be reported to senior management and potentially members of the Board of Directors.

15. What kind of auditing and assurance will be performed to determine compliance under the human rights compliance program?

We may use internal and external audit processes. Some of the auditing may take place by our internal audit group. Some may take place through external specialists, who may analyze discrete elements of the human rights program. Ultimately, we will use varied approaches, general and specific, internal and external, to assess programmatic effectiveness.

16. Who will receive human rights training?

Training will be provided, at a minimum, to all new employees, and all employees who may impact human rights, receive reports or complaints on human rights, and who may oversee programs involving human rights. These will involve management, legal personnel, human resources, security personnel, community relations personnel, individuals involved in administering the supply chain and overseeing third parties, and others.

17. What information will be tracked and reported internally and externally?

The information to be tracked may include the type and frequency of reports related to human rights violations, how a report was resolved, whether the report was deemed credible, how long it took to be resolved, and other similar factors. Some of this information may be released publicly in aggregated form.

18. How will we seek to engage with host governments, as appropriate, consistent with the Human Rights Policy?

The nature of that engagement will differ with each government, and each site. The engagement may include activities such as training, financial or in-kind support, program design and advice, physical infrastructure projects, community relationship-building, capacity building, and advisory work in drafting laws and regulations

19. Who will oversee the Policy?

This Policy is overseen by the Group directors, under the request of Committee of the Board of Directors, which receives regular updates on our human rights performance. Responsibility and accountability for implementing the Policy rests with the General Managers and Executive Directors in the countries where we operate.

20. What policies and procedures are relevant to our human rights approach?

The Code of Business Conduct and Ethics, Environmental Policy, Safety and Health Policy, Anti-Bribery and Anti-Corruption Policy, and Supplier Code of Ethics are some of the policies relevant to the human rights compliance program.