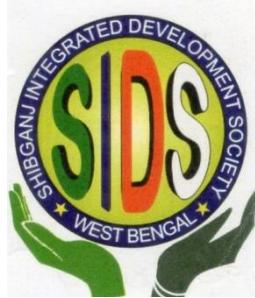


HUMAN RIGHTS POLICY



Approved by: *Executive Committee of Shibganj Integrated Development Society*

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HUMAN RIGHTS POLICY

Introduction:

Human rights serve to safeguard the dignity and equality of all individuals, encompassing a wide array of rights spanning civil and political aspects as well as economic, social, and cultural rights. These rights, termed as "internationally recognized," are outlined in global or regional instruments aimed at defending and protecting human rights. Furthermore, international human rights law places emphasis on specific treaties tailored to safeguard groups often labelled as "vulnerable," such as women, children, indigenous communities, individuals with disabilities, and migrant workers. A milestone in this arena is the United Nations Guiding Principles on Business and Human Rights. These principles, unanimously endorsed by the United Nations Human Rights Council establish the corporate responsibility to uphold human rights.

Policy:

Shibganj Integrated Development Society (SIDS) strongly supports the human rights policy. It is a commitment of SIDS to upholding human rights principles in all its activities and operations. It establishes clear guidelines for executive body, staff, members, volunteers, and partners to ensure ethical conduct and accountability in promoting and protecting human rights. This policy typically addresses issues like non-discrimination, fair treatment, transparency, and accountability. SIDS fosters a culture of respect and full attention to the development of everyone, in particular through lifelong learning, by promoting diversity, inclusivity and well-being, while also respecting merit and providing equal opportunities for all.

Purpose:

Our purpose is to make the world a little less complicated, while acting responsibly and with integrity. We believe that our purpose can be best fulfilled by bringing a human approach to everyone anywhere, by respecting human and labor rights and the equality of all human beings and by promoting good intentions and honesty. We also include labor and human rights matters such as employee health and safety, working conditions, social dialogue, child labor, forced labor, and human trafficking, diversity, discrimination, and harassment, work councils as well as external stakeholder human rights.

Commitment:

We are committed to respecting and safeguarding the human rights of those who are directly or indirectly impacted by Shibganj Integrated Development Society.. Our people are our greatest asset, and we therefore strive to attract talent, provide continuous development opportunities, recognise performance, ensure a safe working environment and promote employee health and wellbeing. We also ensure we make meaningful and lasting improvements to employment practices and workplace conditions across our supply chain.. Finally, we place the highest importance on customer safety, welfare and respect. We are committed to, and require all Business Associates to commit to, respecting and upholding the human rights principles. We recognise the importance of collaboration in driving long-lasting positive change. We therefore work with Business Associates, civil society organization, governments and other businesses to inform our approach, share key insights, work to achieve positive systemic change.

We support the principles of transparency in relation to human rights impacts as set out in various human rights related legislation. SIDS supports a partnership approach, working with others who have the mandate, competence, and capacity to facilitate change and ensure respect for human rights. We are guided by our own values to use our influence appropriately, and we will seek to work with others to effect change where possible.

Our Human rights actions and matters:

We recognize that climate change is of great threat and will have negative impact on humanity now and for the future. Shibganj Integrated Development Society is therefore strongly committed to help reduce climate change. We will reduce climate change by establishing partnerships with stakeholders and developing sustainable transportation solutions for our customers as well as reducing our own footprint.

We are also very proud of our collaborations with various UN organizations and NGOs, which Shibganj Integrated Development Society has been serving since its incorporation. We help these organizations with Aid & Relief by transporting medical and emergency supplies in need whether from natural disasters, man-made disasters, or poverty. We are committed to complying with the local laws in every country where we conduct business. In case of a contradiction between national laws and international standards we will adhere to national law, while still seeking ways to respect international human rights to the greatest extent possible.

Understanding Human Rights:

Here we provide more detail on the human rights that must be respected by SIDS and all Business Partners.

No use of child labor:

Child labor shall not be used. Child labor is defined by the ILO as; 'work that deprives a child of their childhood, their potential and their dignity, and that is harmful to their physical or mental development including by interfering with their education.' SIDS and its Business Partners shall ensure they do not employ younger than 15 in line with the ILO Minimum Age Convention 138 or below the country's legal minimum age for employment or the age established for completing compulsory education.

When young people those under 18 years of age but above the legal working age are employed, they must not do work that is mentally, physically, socially, or morally dangerous or harmful or interferes with their schooling, as set out in ILO Convention 182. Young people must be afforded extra protection and must not be employed in hazardous work, which includes working at night, working overtime, being exposed to chemicals, pesticides, machines or tools, dust or excessive cold, heat or noise. Employees and Workers under the age of 18 must be subject to an appropriate risk assessment and regular monitoring of their health and working conditions.

Employment is freely chosen:

All work must be conducted on a voluntary basis, not under threat of any kind. There will be no use of modern slavery, including forced labor, bonded labor, indentured labor. Employees and Workers should not pay for a job or pay any monetary deposits on starting work. Employees and Workers must be able to leave their employer after reasonable notice.

A safe and healthy workplace is provided:

All Employees and Workers must be provided with clean and safe conditions in all work and residential facilities. Employees and Workers should have access to clean toilet facilities, potable water, and if applicable, hygienic food storage. Adequate steps to prevent accidents and injury arising during work. In the event of an occupational accident or incident, emergency healthcare must be provided. Health and safety information and training should be provided to Employees and Workers, so they are able to understand the hazards, risks and control measures associated with their job. At least one senior management representative should be assigned responsibility for health and safety.

No discrimination is practiced

All Employees and Workers must be treated with respect and dignity. The employment relationship must be based on the principle of equal opportunity. This means that Employees and Workers must not be discriminated against based on race, colour, religion, ethnicity, disability, gender, sexual orientation or gender identity, political affiliation, and pregnancy status in any hiring or employment practices. The rights of minority and vulnerable groups must be protected, including the rights of women.

Fair wages and benefits:

Shibganj Integrated Development Society and all Business Partners must pay at least the relevant legal minimum wage and provide all legally mandated benefits and paid leave. Wages should always be enough to meet basic needs and to provide some discretionary income. A transparent process must be established to ensure that Employees and Workers are compensated in a timely manner.

Working hours are not excessive:

Shibganj Integrated Development Society and Business Partners must ensure that working hours comply with national laws and collective agreements. Standard weekly working hours, excluding overtime, must be defined by contract and to ensure a safe and healthy working environment and adequate rest time between shifts. The total hours worked, including overtime, in any week, must not exceed 60 hours in a single week. Employees and Workers should receive clear communication about whether overtime is required and the wages to be paid for such overtime.

Freedom of association

We are committed to providing a collaborative work environment with direct communication between management, employees, and where Employees have chosen to organize within an appropriate framework. We respect the legal rights of all employees to establish and join labor organizations and trade unions for the promotion and defense of their interests and have zero tolerance to any subsequent discrimination and harassment.

Due diligence:

We are committed to identifying, managing and mitigating our human rights impacts in line with international best practice. We undertake an annual human rights risk assessment and in-depth human rights impact assessments. We work with our Business Partners to manage and mitigate these risks. We expect our Business Partners to accept any recommended actions to manage and remediate adverse impacts. We work closely with a range of subject matter experts, civil society organizations and NGOs to understand the impact of our business activities.

Remedy:

Where our due diligence processes identify that we have caused or contributed to potential or actual adverse human rights impacts, we will take appropriate steps to cease, prevent and mitigate these impacts, and evaluate the effectiveness of our actions. We expect our Business Partners to support and work with us to cease, prevent and mitigate any human rights impacts which are identified in our value chain. We are committed to supporting Business Partners to improve their human rights management practices.

Training and Capacity Building:

We are committed to building knowledge and capacity across the business to respect human rights and expect our Business Partners to do the same. All Employees have access to online human rights training. All Employees are provided with mandatory training on our Code of Conduct which includes information on human rights and how to report concerns. We are committed to working with our Business Partners to drive continuous improvement. All training is registered and stored digitally in the system, and the number of employees trained is reported in our annual sustainability reporting. We have a target of training 100% of our employees and report the figure annually in our sustainability report. In our annual sustainability reporting we will be publishing figures and progress on our employee training. We collaborate with a range of third parties to support capacity building across our supply chain.

Grievance mechanism:

Our grievance mechanism is called 'Speak Up' and it is available to all SIDS employees, and all Workers, as well as anyone outside of our business. We expect Suppliers to also provide a grievance mechanism for Workers to raise occupational concerns. Concerns can be reported as part of Speak Up through the following channels: telephone, web portal, e-mail, or mail. Any concern received through Speak Up, is investigated in line with our principles of humanity, confidentiality, proportionality and safeguarding. Once the facts have been established, the concern is addressed in an appropriate way. Appropriate feedback is provided to the complainant in a timely manner. All reports via Speak-Up are treated in strict confidence. Where requested, SIDS will take all appropriate measures to protect the identity of individuals who report and to safeguard them from retaliation.

Operational procedures:

Communicating human and labor rights to its target audiences in an accessible and appropriate manner, especially to affected stakeholders who raise issues, providing quality information to assess the appropriateness of the response(s), in a way that does not pose risks to stakeholders or affected personnel.

SIDS has adopted operational procedures that include:

- Carrying out human rights impact assessments (HRIA) or environmental and social impact assessments (ESIA) covering human and labour rights. A human rights checklist will be used on annual basis to analyse the projects with regards to SIDS's human rights commitments.
- SIDS applies due diligence analysis regarding the integrity of third parties to strengthen prevention and control mechanisms to ensure alignment of its business operations with the best market practices.
- SIDS selects counterparties based on SIDS policies and procedures which include ethical, technical, and economic selection criteria – which are clear, impartial and pre-determined.
- SIDS's Complaint Management System provides the possibility for internal and external stakeholders to report any conduct or incident that does not comply with SIDS's ethical standards, legal provisions, or internal regulations, including human rights issues and incidents, through SIDS Speak Up Channel.

Governance :

SIDS Board of Directors has the ultimate responsibility for overseeing the management of human rights topics established in this policy. Periodic reports will be presented before SIDS Management Committee.

Communication:

The communication of this policy is carried out on a permanent basis and is updated from time-to-time, as follows:

- Published on the SIDS corporate website and intranet.
- Communicated, explained, integrated within the training plans to the SIDS employees.
- Included in SIDS's business relationships with other companies, namely suppliers, joint venture partners, etc.

Applicability:

This policy applies to the following:

- All SIDS personnel
- All SIDS controlled affiliates in all their geographic locations, regardless of the local practices or level of social and economic development.

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