

	Natural Habitats Group		
	POLICY:	<i>GROUP HUMAN RIGHTS POLICY</i>	
	Code:	Section: Communication	Date: 17/10/10

HUMAN RIGHTS POLICY

At Natural Habitats, we believe that respect for human rights is essential for successful business management and detrimental for the sustainable development of the world. Therefore, we aim to respect and proactively foster internationally-recognised human rights within our sphere of influence, especially the rights of the most vulnerable groups in the communities where the company operates. We perceive it as our duty, and this is the baseline for our social responsibility policies.

Natural Habitats Group is committed to respect and support human rights as contained in:

- Universal Declaration of Human Rights (1948)
- United Nations Guiding Principles on Business and Human Rights (2011)
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work ('ILO Core Conventions')
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- ILO Convention 169 (1989) on Indigenous and Tribal Peoples
- UN Declaration on the Rights of Indigenous Peoples (2007)

This Policy extends to all employees of Natural Habitats Group and its subsidiary companies and determines the choice of our partners. All our internal policies and procedures are developed with integrity, honesty and respect for the human rights. Although particular legal provisions and formulations may differ in the various locations in which the company operates, our principles remain the same worldwide.

Developed by: CSR Coordinator Date: 17/09/2017	Updated by: Date:	Authorised by: Date:	1
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THE IMPLEMENTATION OF OUR POLICY:

Natural Habitats Group identified three priority areas of impact:

OUR PEOPLE

Natural Habitats is committed to maintaining a working environment that respects and supports the provision of basic human rights to all of its employees around the world, regardless of the country in which they work, to the full extent permitted by law. To this end:

- NHG strictly prohibits all forms of forced or compulsory labour for any employees;
- NHG is committed to providing equal employment opportunity to all qualified persons;
- NHG respects employees' right to engage in free association and to participate in a collective bargaining process;
- NHG strictly prohibits child labour, or any type of work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development;
- NHG fully commits to abide by national laws related to health and safety. The company ensures that a safe and healthy working environment is provided for all our employees, contractors and visitors;
- NHG strictly prohibits discrimination and sexual harassment.

Our personnel worldwide receive training on a variety of human rights related issues, including but not limited to, equal employment opportunity, diversity, money laundering, bribery and corruption.

FARMERS AND AFFECTED COMMUNITIES

Natural Habitats Group is committed to respect and safeguard rights to lands and natural resources traditionally occupied and used. In all countries of operation, the company respects customs of inheritance and avoids forced removals. For this reason, the company has developed Land Use Policy, which covers the following:

- NHG ensures the affected parties are given free, prior and informed consent (FPIC), when in consultation for the development of any projects.
- NHG works with independent smallholders, who are not bound by any contract, credit agreement or panning to the company's mill.

Developed by: CSR Coordinator Date: 17/09/2017	Updated by: Date:	Authorised by: Date:	2
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- The leasing of land for NHG' future operations will not diminish the legal, customary or user's rights, including those that may rely on the land access for their livelihoods (especially women).
- NHG strives for complete transparency when completing land lease arrangements.
- NHG is committed to provide all relevant information in appropriate forms and languages, including but not limited to impact assessments, proposed benefit sharing and legal arrangements.
- NHG respects and supports the rights of the local community to access land for food, nutritional and religious security.
- NHG expressly prohibits the use of mercenaries and para-militaries in any of our operations. In addition, any contracted security forces are forbidden from engaging in extrajudicial intimidation or harassment.

EXTERNAL SERVICE PROVIDERS

For the external service providers, Natural Habitats prepares or requests a Code of Conduct. NHG requires that they adhere to all applicable domestic laws and encourage them to be consistent with ILO core labour principles.

MONITORING THE EFFECTIVENESS

To monitor the effectiveness of the commitment NHG sets key performance indicators in the countries of operations. The tracking of the progress is integrated into regular internal reporting processes. Moreover, the company has in place grievance mechanisms to receive any internal and external feedback from company's stakeholders.

REPORTING OF TRANSGRESSIONS

Natural Habitats Group encourages the reporting of any transgressions against this Policy.

All **employees** of the group should address such reporting primarily to their supervisor. If the supervisor is part of the issue the matter should be addressed directly to the head of the relevant business unit or the group sustainability department. All communication will be treated as confidential and will not result in any disciplinary action or retaliation against the persons making them.

Developed by: CSR Coordinator Date: 17/09/2017	Updated by: Date:	Authorised by: Date:	3
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External stakeholders are advised to report any breach of this policy to the Group Human Resources Director. There is a [grievance procedure](#) available on the group's website through which the reporting can be done.

Developed by: CSR Coordinator Date: 17/09/2017	Updated by: Date:	Authorised by: Date:	4
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