

# Labour and Human Rights Policy

February 2022

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## **Section 1 – Introduction, Purpose and Scope**

### **1. Introduction**

Borchard Lines Ltd employees are of great value and the key to our success. The organisation must strive to provide a workplace where employees can fulfil their potential in an open and inspirational working environment. We must maintain a strong commitment to high standards that deliver a fair, respectable and safe workplace for all employees in the Group.

### **2. Purpose**

The purpose of this policy is to define the labour and human rights standards to which all employees of Borchard Lines Ltd are entitled, irrespective of the country in which they work.

### **3. Scope and principles**

This policy applies to and is for all employees of Borchard Lines Ltd at both our Head Office and all local offices around the world.

The Policy will be reviewed either an annual basis, or if there is any significant change to the activities or operations of the organisation, to keep the policy up to date.

### **4. Responsibilities**

The person responsible for and owner of this policy is the Borchard Lines Chartering Manager.

Line management is generally responsible for the application of this policy along with individual employees. Any incidents should be reported to the Chartering Manager. This Policy has the complete support of the Board of Directors and the Management team of Borchard Lines Ltd.

## Section 2 – Topics

### 1. Respect Freedom of Association and Collective Bargaining

Borchard Lines will respect employee's lawful right of free association, as well as their lawful right to join, form or not to join a labour union or otherwise engage in collective bargaining.

### 2. No Forced and Compulsory Labour

Borchard Lines will not use forced or involuntary labour, including prison labour, indentured labour, bonded labour or slave labour.

### 3. No Harassment and Abuse of Labour

Borchard Lines will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment or any other form of abuse, and will comply with all applicable laws on harassment and abuse of employees.

### 4. No Child Labour

Borchard Lines will comply with all applicable child labour laws

### 5. Non Discrimination

Borchard Lines will not tolerate discrimination against its employees in any condition of employment on the basis of race, colour, national origin, sex, religion, age, disability, HIV/AIDS status, trade union membership, sexual orientation or any other personal characteristic unrelated to job performance and will comply with all applicable employment discrimination laws. Any employment-related decisions, from hiring to termination and retirement, must be based solely on lawful, non-discriminatory criteria.

### 6. Diversity

Borchard Lines will have an active diversity program and engage with small businesses, minority and woman-owned business and other diverse categories

### 7. Employee Health & Safety

Borchard Lines will comply with the requirements of the Health and Safety at Work Act 1974

### 8. Appropriate Work Hours and Wages

Borchard Lines will comply with all applicable laws on work hours and overtime, as well as all applicable laws on wages and benefits.

## Section 3 – Objectives and Exceptions

### 1. Objectives

Borchard Lines will look to apply quantitative targets to ensure conformance with this policy is maintained. These will be held and recorded in the "*Sustainability Objectives Matrix*" and will be reported on and regularly reviewed at each Quality Management Review meeting.

### 2. Exceptions

No exemptions from this policy can be granted unless there are exceptional circumstances, or the policy is obviously not applicable. Any request for an exception must be made in writing to the Chartering Manager who will assess and decide on each request individually. Each exception granted will be logged and documented.