

Policy HUMAN RIGHT

SUSTAINABILITY DEPARTMENT

| 1 | GTPO | GTPOL005 | |
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| I | Archiving | HSE Department | |
| | Confidentiality: | Internal | |
| L | Company: | Goldtree Ltd | |
| L | Version: | 003 | |
| | Communicated: | 28/02/2020 | |
| | Review date: | 04/02/2020 | |
| L | Creation date: | 15/11/2015 | |
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Goldtree SL Ltd believes that respect for human rights is essential for successful business management and detrimental for the sustainable development of the world. Therefore, it aim to respect and proactively foster internationally-recognized human rights within its sphere of influence, especially the rights of the most vulnerable groups in the communities where the company operates.

Definitions

Human Rights Defenders: Individuals, groups and associations who promote and protect universally recognized human rights and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individuals and peoples.

¹Whistleblower: Individuals who are employees or former employees who report on illegal, irregular, dangerous or unethical practices or actions by employers which contravene RSPO Code of Conduct and related key documents and who may potentially be at risk of reprisal.

Policy statement

Goldtree Holdings is committed to respect and support human rights as contained in:

- United Nations Declaration on Human Rights Defenders
- 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 (with specific reference to the protection of whistleblowing as an aspect of freedom of expression under Article 19)
- International Covenant on Economic, Social and Cultural Rights
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- UN Declaration on the Rights of Indigenous Peoples (2007)

In the light of this Declaration, Goldtree is committed to:

- Preventing any form of human rights abuse as enshrined in the constitutions of the countries it operates in and the international human rights guidance. The group's key compliance focuses are:
 - Respect for employees' and stakeholders' human rights.
 - Prohibition of retaliation against human rights defenders and whistle blowers;
 - Respect for local authorities: respect of the rights, cultures, customs and values of host communities2; and

¹ Whistleblower includes individuals who are outside the traditional employee-employer relationship, such as contract workers, temporary workers, consultants, contractors, trainees/interns, volunteers, student workers and former employees



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- Prohibition of extra-judicial intimidation and use of mercenaries and para-militaries in our operations;
- Grants protection for reports made with a reasonable belief (when a person reasonably could suspect
 wrongdoing in light of available evidence) that the information is true at the time it is disclosed.
- Protect individuals against violence, threats, and all forms of retaliation, direct or indirect, pressure or any other arbitrary action as a consequence of the individual's legitimate exercise of their fundamental human rights in the course of their engagement with Goldtree.
- Protect individuals from all forms of retaliation, disadvantage or discrimination in the workplace linked or resulting from HRD activities. The identity of the individual will not be disclosed without the individual's explicit informed consent.
- Encourage the right of employees and workers to decline to participate in corrupt, illegal or fraudulent acts.
- Protects individuals, against threats by the member, who have disclosed information anonymously
 including those who subsequently have been identified without their explicit consent.
- Guarantees a safe and independent grievance mechanism procedure to avoid, mitigate and remedy any direct and indirect risks to individuals caused by their operations.

Date of approval: January 2020

Signed: Pieter Van Dessel

General Manager Goldtree SL Ltd