



HUMAN RIGHTS POLICY





Contents

- 1. PURPOSE AND POLICY STATEMENT.....3**
- 2. SCOPE OF APPLICATION 3**
- 3. DEFINITIONS..... 4**
- 4. COMMITMENTS AND GUIDELINES 5**
 - 4.1 Our Human Rights Commitments5
 - 4.2 Guidelines7
 - 4.3 Human Rights Due Diligence7
 - 4.4 Protection and No Retaliation.....8
- 5. RESPONSIBILITIES 9**
- 6. SPEAK UP 9**
- 7. DISCIPLINARY ACTION 10**
- 8. REVIEW PROCESS..... 10**

1. PURPOSE AND POLICY STATEMENT

As a global port operator, engaging with a variety of entities and individuals throughout the supply chain, QTerminals' business activities have a large impact on its Employees, partners, suppliers, customers, and other Third Parties. QTerminals is aware of its responsibility that comes with the effect its business has on people and the environment and recognises its obligation to uphold the inherent dignity and equal rights of everyone affected directly through its activities or indirectly through its partners.

QTerminals ensures compliance with human rights standards through its Corporate Values – Safety, Integrity, and Teamwork – which are the foundation of QTerminals' culture and the leading principles for every action it takes.

QTerminals is committed to respecting human rights in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs) and acts in accordance with international human rights standards as set out in:

- The United Nations (UN) Universal Declaration of Human Rights
- The International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights)
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- Relevant local laws that support and build on these principles.

The Human Rights Policy (hereinafter "Policy") contains QTerminals' commitment to human rights and dictates the standards and principles in regard to how QTerminals does business and how it engages with communities in its areas of operations.

Moreover, this Policy explains the approach to identify, prevent, and mitigate human rights violations (chapter: 4.3 Human Rights Due **Diligence**) and commits to remediation for any adverse human rights impacts in case QTerminals causes or contributes to any.

QTerminals expects any Third Party that works with it or on its behalf to uphold the principles stated in this Policy and requires them to adopt similar policies within their own businesses.

The Human Rights Policy is complementary to QTerminals' Code of Conduct and Third Party Code of Conduct and hence should be read together.

2. SCOPE OF APPLICATION

The Policy applies globally to all Employees of QTerminals, as outlined in the "Definitions" section of the Policy below. The Policy does not replace any national or international law. In case applicable laws in specific regions are stricter than the standards and principles outlined in this Policy, the stricter law or regulation shall take prevalence over this Policy. In case applicable laws in specific regions are more lenient than the standards and principles outlined in this Policy, the standards of this Policy apply.

QTerminals expects that any Third Party who works with it or on its behalf (including with no limitation business partners, suppliers, consultants, and other representatives) must adopt and follow the principles of the Policy, plus Third Parties are expected to have a compatible human rights policy of their own.

In addition, Third Parties must adopt and comply with the QTerminals Third Party Code of Conduct.

For more information, please refer to [Third Party Code of Conduct](#).

3. DEFINITIONS

Bonded Labour describes the situation where an employer is forced to work without being paid to repay a loan.

Child Labour is defined as work that deprives children of their childhood and from the opportunity to attend school. It further deprives their dignity and is harmful to physical and mental development.

Coercion refers to the act or process of persuading an individual forcefully to do something against their will.

Collective Bargaining refers to the process of negotiations between QTerminals and a group of Employees, which is usually represented by a labour union, aimed at reaching agreements that regulate working conditions.

Discrimination is an unjust or prejudicial treatment of a person, or a particular group based on characteristics (e.g., nationality, religion, ethnicity, culture, etc.)

Due Diligence is the analysis process to identify potential negative impacts on human rights and non-discrimination within QTerminals and across its supply chain.

Employees means all QTerminals' employees (including contracted workers), officers, directors (including those assigned to minority owned and non-controlled entities of QTerminals).

Ethics Review Panel (ERP) means a multidisciplinary body within QTerminals committed to reviewing all reported alleged unethical matters, misconduct, and wrongdoings in a timely manner and deciding on the respective disciplinary action. ERP members are selected on the case-by-case basis by the Group Legal and Compliance Director, depending on the nature and criticality of the alleged misconduct and/or wrongdoing.

Ethical refers to activities that are supportive of moral values and respect fundamental human rights.

Forced **Labour** describes any work or services people are forced to do against their will, usually under threat of punishment.

Human Rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

Human Trafficking is the use of violence, threats, or coercion to transport, recruit, or harbour people in order to exploit them for purposes such as labour, criminality, forced marriage, organ removal, etc.

KYC/KYS or Know Your Customer/Know Your Supplier is a process of verifying all Third Parties, with whom QTerminals has a contractual agreement, including suppliers and customers to ensure Third Parties are not sanctioned or involved in money laundering and terrorism financing activities.

Line Manager is a person with direct managerial responsibility for a particular Employee.

Modern Slavery refers to situations of exploitation that a person cannot leave because of threats, violence, coercion, deception, and/or abuse of power.

Personal Data means any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Prison Labour refers to the work that is performed by incarcerated and detained people.

Privacy describes a state or condition of being free from being observed or disturbed by other people. In the context of information, it refers to the right of an individual to control the collection, use, and disclosure of personal information about themselves. This includes their right to determine who has access to this information and under what circumstances.

QTerminals means QTerminals W.L.L. and its controlled subsidiaries, affiliates, and joint ventures.

Remedy / Remediation refers to a form of rehabilitation, financial or non-financial compensation, punitive sanctions, or prevention of harm through, for example, injunctions or guarantees of non-repetition.

Third Party is any business partner, supplier, service provider, consultant, and other representatives with whom QTerminals has a business relationship.

Threat is an expression of intention to inflict evil, injury or damage an individual.

UN Guiding Principles on Business and Human Rights are a set of principles created by the UN that States and Organisations must follow to mitigate, address, and remedy human rights violations within a business environment.

Violence refers to the act of using physical force to injure, abuse, damage, or destroy.

4. COMMITMENTS AND GUIDELINES

4.1 Our Human Rights Commitments

As a global organisation that employs and impacts many organisations and individuals across the world, QTerminals is aware of its influence and responsibility to people and the environment and hence commits to not only be compliant with human rights but contribute to the prevention, identification, and mitigation of their violation.

Modern Slavery

Victims of modern slavery might face violence or threats or be forced into inescapable debt. Victims might also experience that their identity and immigration documents get destroyed, concealed, or confiscated and they might be threatened with deportation.

QTerminals strictly condemns any form of modern slavery, illegal exploitation, and coercion of humans for personal or financial gain.

Human Trafficking

Human Trafficking is a form of modern slavery, in which individuals are violated, threatened, or coerced to recruit or harbour people in order to exploit them for the purposes of labour, criminality, forced marriage, organ removal, etc.

At QTerminals, any practice that constitutes the trafficking of humans is strictly prohibited and condemned. This includes involvement of QTerminals through its own business practices, as well as indirect involvement through its business partners.

Forced Labour

QTerminals only permits employment engagements that are out of free will – any kind of forced labour, including prison labour, and bonded labour are strictly prohibited. All employees are free to leave work or terminate their employment within the criteria and specifications stated in the employment contracts (e.g., notice period).

Child Labour

QTerminals strictly prohibits the use of children or any individual under the legal working age from conducting any work associated with QTerminals and is committed to protecting the rights and dignity of children across the globe.

Non-Discrimination

Non-discrimination refers to the equal treatment of all humans regardless of their ethnicity, race, sex, age, or other status. QTerminals has zero-tolerance for any kind of discrimination within the workplace.

Due to the great importance of non-discrimination in workplaces, QTerminals dedicates a separate Policy to its commitment to creating a safe, inclusive, and respectable workplace in accordance with international and relevant local regulations.

For more information, please refer to [Non-Discrimination Policy](#).

Freedom of Association and Collective Bargaining

QTerminals acts in accordance with local labour regulations and recognises the freedom of association and the right of workers to join trade unions or other workers' organisations/legal associations of their choice to seek representation and to bargain collectively, as permitted by and in accordance with locally applicable law. Should workers decide against joining unions or engaging in collective representation, QTerminals would also recognise and respect this.

Health and Safety

QTerminals is committed to ensuring that its workplace upholds the highest health and safety measures in line with international and local regulations. Additionally, QTerminals commits to having appropriate steps in place to prevent injuries and occupational illnesses.

Data Privacy

Privacy, and consequently data privacy, is a key human right as it is the core component which ensures human dignity and in particular freedom. Without it, humans would lose the ability to act under free will and could be exposed to safety risks.

QTerminals recognizes that personal data must be treated with caution, and with the highest standard of ethical conduct. As per the Data Protection Policy, QTerminals prohibits the illegal collection, processing, and transferring of Personal Data. Personal Data that relates to ethnic origin, children, health, physical or psychological condition, religious creeds, marital relations, and criminal offenses, is considered sensitive. Therefore, local legislation will be followed to ensure the privacy of this kind of data.

For more information, please refer to [Data Protection Policy](#).

Ethical Partner Management

As an international terminal operator, QTerminals engages with a multitude of stakeholders across the globe on a daily basis. Each stakeholder plays a crucial and impactful role within the overall QTerminals ecosystem and is therefore viewed as an extension of the company.

QTerminals expects that any Third Party that works with QTerminals or on their behalf abide by the same human rights and non-discrimination standards set out within this Policy and have a compatible human rights and non-discrimination policy of their own in place.

QTerminals is committed to ensuring that it does not conduct business with an entity that does not fulfil human rights and will continuously introduce respective measures to identify and mitigate human rights violations.

QTerminals has a KYC/KYS screening process in place that assesses all Third Parties, with whom QTerminals has a contractual agreement, including suppliers and customers, to ensure ethical partner management, prevent money laundering, and counteract terrorism financing activities.

For disciplinary actions in case of human rights violations by Third Parties, please refer to the [Third Party Code of Conduct](#).

4.2 Guidelines

QTerminals requires support of its Employees to be able to identify and mitigate any kind of violations against human rights. This includes the commitment of all Employees to strictly comply with this Policy and directly report any incidents violating this Policy either self-experienced or observed. Precisely, if a QTerminals' Employee becomes aware of a human right standard not being upheld by any member, group or Third Party affiliated with QTerminals, they must report it immediately. They may report it directly through Line Manager, the Whistleblower, or opt for alternative methods like QTerminals Ethics Line.

For more information on how to report violations of human rights, please refer to chapter: **6. SPEAK UP**

Line Managers, including all those guiding or supervising other Employees, are expected to be role models by demonstrating exemplary behaviour as per this Policy, creating awareness, and advocating Corporate Values and the Policy daily. Additionally, Line Managers are also expected to listen and respond to the queries of their subordinate colleagues and create a safe environment to ask questions and speak up. If an ambiguous situation arises, Line Managers are expected to highlight it to a Compliance Officer/Representative.

Listed below are a range of examples which could possibly arise that would be considered a violation of this Policy and hence would need to be reported immediately.

Examples of human rights violations:

- You come to know that a contractor engaged with QTerminals forces any employee to stay within the company, against his/her will – this is an example of forced labour.
- You are restricted from joining an association that local labour laws deem to be legal – this is restricting the freedom of association and is a violation.
- You and your co-workers believe there is a lack of protective gear or safe operational equipment during the process of moving cargo to and from ships – this risks the safety of our Employees and therefore violates our standard on health and safety.
- You discover through various means that a manager is sharing private information about his Employees or customers with external parties in return for financial gain – this is considered a breach of data privacy.

4.3 Human Rights Due Diligence

QTerminals commits to conducting a human rights risk and impact analysis within its own business and along its supply chain on a regular basis. This encompasses the analysis of internal processes and systems and external interactions that might be influenced by QTerminals' activities. Additional ad-hoc assessments will be conducted whenever required.

Based on the findings, QTerminals will take action to ensure that potential adverse human rights impacts are successfully prevented and mitigated, and actual impacts are remediated, where it has caused negative human rights effects. The effectiveness of its actions will be monitored on a regular basis.

QTerminals commits to covering human rights as a part of its regular reporting on ESG to ensure transparency.

QTerminals further commits that any violation of this Policy reported by QTerminals' Employees, or any other associated Third Party will be reviewed, and valid cases will be investigated by the Compliance Team. Respective disciplinary actions are in place for violations against this Policy (Chapter: **7. DISCIPLINARY ACTION**).

4.4 Protection and No Retaliation

QTerminals pledges to safeguard all individuals who advocate respect for human rights associated with its activities.

It also commits to providing remedy where activities associated with QTerminals have negatively impacted human rights.

Lastly, QTerminals ensures that there will be no retaliation for reporting. If Employees are still uncomfortable, they can use the Ethics Line which will maintain their anonymity.

5. RESPONSIBILITIES

Maintaining standards that support human rights are not only legal requirements for businesses to follow but are also moral and ethical duties that humans should adhere to. Failure to comply with them is against the law and exposes the company to significant consequences. Therefore, all Employees are responsible for reading, understanding, acknowledging, and adhering to all aspects of this Policy and any supplementary procedures issued by QTerminals, including:

- Complying with any applicable standards set in this Policy within their daily business conduct
- Identifying breaches of these standards and reporting them immediately
- Collaborating with Line Managers and relevant departments to provide additional information, if needed, to prevent or act upon any violations of the Policy
- Being vigilant for any suspicious activity that can be a potential breach of this Policy, both at QTerminals, our suppliers, partners, and other Third Parties working with us
- Prioritising and completing any mandatory training related to this topic in a timely manner
- Contacting respective Line Manager and, if required, a Compliance Officer/Representative to clarify questions, request information, or express concerns relating to this topic

Line Managers, along with the relevant guidance of Compliance and HR departments, shall ensure that any Human Rights concerns are reported, addressed, and resolved.

Management of QTerminals is responsible for ensuring that the components of this Policy are respected. Each managing senior executive of QTerminals at port or terminal level must ensure that the business unit they are responsible for is and will remain fully compliant with this Policy. They must also promote awareness and understanding of this Policy and ensure allocation of adequate resources to effectively implement all standards mentioned in the Policy. Specifically, the Compliance team must ensure that the required processes are in place that enable adherence to this Policy.

6. SPEAK UP

QTerminals promotes an environment of integrity and transparency under which its Employees are encouraged to report any violation or suspected violation of this Policy within QTerminals or at any of the Third Parties, either by informing their Line Manager, their HR department, their Compliance Officer/Representative or alternatively through the QTerminals Ethics Line, which is available on QTerminals intranet, QTerminals website and as a dedicated phone line.

Additionally, any retaliation against anyone who notices and reports a known or suspected violation of the Policy is strictly prohibited. Anyone proven to have retaliated against a person who has reported a breach in good faith will be subject to disciplinary action. However, any false or malicious allegations may also lead to appropriate disciplinary and legal action, up to and including termination of employment.

For more information on the whistleblowing process, please refer to [QTerminals Whistleblower Procedure](#).

7. DISCIPLINARY ACTION

At QTerminals, all Employees are expected to abide by this Policy. Any violation thereof may result in disciplinary action, termination of employment or legal proceedings.

Additionally, all business relationships will be terminated with immediate effect if found that the Third Party has violated the standards QTerminals has documented within this Policy. There is zero tolerance for any breaches regardless of the circumstance.

In case the complaints for wrongdoings warrant an investigation, these will be conducted until completion. The results and proposed corrective actions of the investigations will be reviewed by the Ethics Review Panel (ERP), where corrective actions will be determined based on the facts and circumstances of the breach of conduct and results of the investigation.

For more information on the process of investigation of alleged misconduct and violations of the Code of Conduct or this Policy, please refer to [QTerminals Whistleblower Procedure](#).

8. REVIEW PROCESS

Compliance team will periodically evaluate the adequacy and effectiveness of this Policy. Depending upon the results of such reviews, amendments might be proposed and introduced.

Approved By:



Group CEO

Neville Bissett