

Subject: Sustainability	Issue Date: 1/4/2016
Document Title: <b>RB's Policy on Human Rights and Responsible Business* - Detailed Requirements</b>	Page Number: 1 of 6
Originator: Global Sustainability Director	Effective Date: <b>1/4/2016</b>



## **RB's Policy on Human Rights and Responsible Business\* - Detailed Requirements**

<b>A No Child Labour. Limitation of Work by Young Workers</b>	
<b>Definition of a child:</b> any person less than 15 years of age; except: a) where local law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply; or b) where local law stipulates 14 years, in which case 14 years shall apply.	
<b>Definition of child labour:</b> any work by a child younger than the age specified above.	
<b>Definition of a young worker:</b> any worker over the age of a child (as above) and under the age of 18.	
A1	<b>No child labour:</b> the facility / company shall not engage in or support the use of child labour as defined above.
A2	<b>Remediation:</b> if children are found working directly or indirectly for the facility / company, the facility / company must take immediate action to remove the child from all work and ensure the child is in a safe place. The facility / company must also take immediate action to identify an effective remediation programme, which puts the best interest of the child first and then implement this within a reasonable timescale. Any remediation programme must include the provision of education to the child free of charge, in addition to full pay, until the child is legally no longer a child.
A3	<b>If young workers are employed:</b> a) <i>who are subject to local compulsory education laws or are attending school</i> , the facility / company shall facilitate educational provision, by: <ul style="list-style-type: none"> <li>• establishing, documenting, maintaining and effectively communicating to personnel procedures for facilitating young workers' education; and</li> <li>• implementing means to ensure that no such young worker is employed during school hours (except as permitted under apprenticeships or other programmes in which they are lawfully participating).</li> </ul> b) <b>Safe working environment:</b> the facility / company shall not expose young workers to situations or activities that are deemed to be hazardous or unsafe to their physical and mental health and development. The minimum age for hazardous work is 18 years. c) <b>No night-time working:</b> young workers shall not work at night. d) The number of hours in which such employment or work may be undertaken per day is compliant with local laws.
A4	RB Group companies will not condone any negligence or lack of proactivity in ensuring there is no child labour at RB facilities or suppliers' facilities. Failure to comply with requirements A1, A2 and A3 above: <ul style="list-style-type: none"> <li>• at a RB facility, may result in disciplinary action and / or the dismissal of the employee(s) responsible for the non-compliance or contractual penalties or termination of the contractor; or</li> <li>• at a supplier facility, may result in requirement for immediate audit and / or remediation and potentially the immediate termination of RB's business relationship with that supplier.</li> </ul>

<b>B No Forced Labour or Human Trafficking</b>	
<b>Definition of forced or compulsory labour:</b> all work or service that is extracted from any person under the menace of any penalty for which said person has not offered him/herself voluntarily or all such work or service as is demanded as a means of repayment of debt.	
<b>Definition of bonded labour / debt bondage:</b> a person becomes a bonded labourer when their labour is demanded as a means of repayment for, or the payment of interest upon, a loan or debt.	
<b>Definition of involuntary prison labour:</b> labour undertaken by prisoners where that labour is not performed voluntarily and for which they do not receive payment; including labour that is extracted under the menace of any penalty or for which such work or service is demanded as a means of repayment of debt or penalty.	
<b>Definition of trafficked labour:</b> the recruitment, transfer, harbouring, obtaining or receipt of persons, by means of the use of threat, force, deception or other forms of coercion, for the purpose of exploitation through forced labour or slavery.	
B1	<b>No forced / bonded / trafficked / involuntary labour:</b> the facility / company shall not engage in, use or support the use of forced, bonded, trafficked or involuntary prison labour.
B2	The facility / company shall not require (nor allow any third parties such as providers of temporary / contracted labour to require) delivery up of any part of any personnel's salary, benefits, property, or documents in order to force such personnel to continue working for the company.
B3	Workers shall be free to leave their employer on reasonable notice and shall have the right to leave the workplace after their shift.
B4	RB Group companies will not condone any negligence or lack of proactivity in ensuring there is no

\*Also known as the Global Manufacturing Standard for responsible production "GMS"

Subject: Sustainability	Issue Date: 1/4/2016
Document Title: <b>RB's Policy on Human Rights and Responsible Business* - Detailed Requirements</b>	Page Number: 2 of 6
Originator: Global Sustainability Director	Effective Date: <b>1/4/2016</b>



HEALTH • HYGIENE • HOME

	<p>forced labour or human trafficking at RB facilities or suppliers' facilities. Failure to comply with requirements B1, B2 and B3 above:</p> <ul style="list-style-type: none"> <li>• at a RB facility, may result in disciplinary action and / or the dismissal of the employee(s) responsible for the non-compliance or contractual penalties or termination of the contractor; or</li> <li>• at a supplier facility, may result in requirement for immediate audit and / or remediation and potentially the immediate termination of RB's business relationship with that supplier.</li> </ul>
--	--

<b>C Health and Safety</b>	
C1	<p>a) <b>Safe and healthy working environment:</b> The facility / company shall comply with applicable health &amp; safety laws / regulations and provide a safe &amp; healthy working environment; including, with due regard to the health &amp; safety hazards posed by the activities being undertaken, and taking reasonably practicable steps to prevent accidents and ill health.</p> <p>b) <b>Accountability:</b> A formal safety committee, or senior management representative of the facility / company, shall be formally responsible for occupational health &amp; safety and compliance with applicable health &amp; safety laws / regulations.</p> <p>c) <b>Adequate training / awareness:</b> The facility / company shall ensure that all personnel receive adequate health &amp; safety training / awareness in line with the requirements of their job function and applicable local law, including the use of any essential personal protective equipment (PPE) and that such training / awareness is also provided for new, temporary / contracted and reassigned personnel, and is refreshed periodically.</p>
C2	<p><b>Emergency evacuation:</b> The facility / company shall establish and maintain arrangements for the emergency evacuation of all persons in the event of fire or other major emergency (e.g. an emergency evacuation plan / procedure, and any necessary equipment, must be in place and periodically tested).</p>
C3	<p><b>Facilities / equipment for employees:</b> The facility / company shall provide adequately stable and safe buildings and, for all personnel: access to adequate toilets and potable drinking water; adequate exits for use in the event of a fire / emergency which shall be accessible at all times; first aid and medical treatment in the event of a work place injury and any essential safety equipment (e.g. personal protective equipment (PPE)) free of charge; adequate lighting &amp; ventilation; and, if appropriate, sanitary facilities for food storage and ensure that workers have adequate rest and comfort breaks.</p>
C4	<p><b>Living quarters:</b> The facility / company shall ensure that, if provided for personnel, dormitory facilities / living quarters are clean, safe, comply with applicable laws / regulations and meet basic needs.</p>
C5	<p>RB Group companies will not condone any negligence or lack of proactivity in ensuring good health and safety at RB facilities or suppliers' facilities. Failure to comply with requirements C1, C2, C3 and C4 above:</p> <ul style="list-style-type: none"> <li>• at a RB facility, may result in disciplinary action and / or the dismissal of the employee(s) responsible for the non-compliance or contractual penalties or termination of the contractor; or</li> <li>• at a supplier facility, may result in requirement for immediate audit and / or remediation and potentially the immediate termination of RB's business relationship with that supplier.</li> </ul>

<b>D Freedom of Association and Right To Collective Bargaining</b>	
D1	<p>The facility / company shall strive to provide adequate and acceptable working terms and conditions for employees so that employees do not feel the need to seek union protection to obtain better terms and conditions.</p>
D2	<p><b>Right to organise:</b> The facility / company shall not obstruct the right of all personnel to form, organise and / or join trade unions of their choice and to bargain collectively, where these activities are not restricted under applicable law. Joining trade unions will not result in any negative consequences to personnel or retaliation from the facility / company.</p>
D3	<p><b>Alternatives where activity is restricted:</b> The facility / company shall, in those locations / situations in which the right to freedom of association and collective bargaining are restricted under law, allow workers to freely elect their own representatives; without contravening applicable laws and regulations.</p>
D4	<p><b>Treatment of workers' representatives:</b> The facility / company shall ensure that any workers' representatives are not the subject of discrimination or maltreatment.</p>

\*Also known as the Global Manufacturing Standard for responsible production "GMS"

Subject: Sustainability	Issue Date: 1/4/2016
Document Title: <b>RB's Policy on Human Rights and Responsible Business* - Detailed Requirements</b>	Page Number: 3 of 6
Originator: Global Sustainability Director	Effective Date: <b>1/4/2016</b>



HEALTH • HYGIENE • HOME

D5	<p>RB Group companies will not condone any negligence or lack of proactivity in ensuring freedom of association and right to collective bargaining at RB facilities or suppliers' facilities. Failure to comply with requirements D1, D2, D3 and D4 above:</p> <ul style="list-style-type: none"> <li>at a RB facility, may result in disciplinary action and / or the dismissal of the employee(s) responsible for the non-compliance or contractual penalties or termination of the contractor; or</li> <li>at a supplier facility, may result in requirement for immediate audit and / or remediation and potentially the immediate termination of RB's business relationship with that supplier.</li> </ul>
----	---

### **E No Discrimination**

E1	<p><b>Equal opportunities:</b> The facility / company shall not engage in or support discrimination in hiring, remuneration, access to training / promotion, termination or retirement based on race, colour, language, caste, national origin, indigenous status, religion, disability, gender, marital status, sexual orientation, union membership, political affiliation, age, pregnancy or any other condition that could give rise to discrimination; except when specifically required by applicable laws / regulations (e.g. as required by certain laws / regulations in South Africa mandating positive discrimination towards disadvantaged groups).</p>
E2	<p><b>Equal rights:</b> The facility / company shall not interfere with the exercise of the rights of personnel to reasonably observe tenets or practices, or to reasonably meet needs relating to their race, colour, language, caste, national origin, indigenous status, religion, disability, gender, marital status, sexual orientation, union membership, political affiliation, age, pregnancy or any other condition that could give rise to discrimination; except when specifically required by applicable laws / regulations.</p>
E3	<p><b>Abusive behaviour:</b> The facility / company shall not allow verbal or physical contact between personnel that is sexually coercive, threatening, abusive or exploitative.</p>
E4	<p>RB Group companies will not condone any negligence or lack of proactivity in ensuring there is no discrimination at RB facilities or suppliers' facilities. Failure to comply with requirements E1, E2 and E3 above:</p> <ul style="list-style-type: none"> <li>at a RB facility, may result in disciplinary action and / or the dismissal of the employee(s) responsible for the non-compliance or contractual penalties or termination of the contractor; or</li> <li>at a supplier facility, may result in requirement for immediate audit and / or remediation and potentially the immediate termination of RB's business relationship with that supplier.</li> </ul>

### **F Disciplinary Practices**

F1	<p><b>Harmful or inhumane treatment:</b> The facility / company shall not engage in or tolerate corporal punishment, bullying, harassment, mental or physical coercion, abuse or other harmful or inhumane treatment of any kind.</p>
F2	<p>RB Group companies will not condone any negligence or lack of proactivity in ensuring there is no harmful or inhumane treatment at RB facilities or suppliers' facilities. Failure to comply with requirements F1 above:</p> <ul style="list-style-type: none"> <li>at a RB facility, may result in disciplinary action and / or the dismissal of the employee(s) responsible for the non-compliance or contractual penalties or termination of the contractor; or</li> <li>at a supplier facility, may result in requirement for immediate audit and / or remediation and potentially the immediate termination of RB's business relationship with that supplier.</li> </ul>

### **G Working Hours**

G1	<p>a) <b>Normal working hours:</b> The facility / company shall comply with applicable laws / regulations on working hours.</p> <p>b) The normal working week (<i>excluding overtime</i>) for non-management employees shall not on a regular basis exceed 48 hours (except where weekly etc. rotation periods are operated e.g. one week on, one week off).</p> <p>c) Employees shall normally be provided with at least one day off in every seven-day period (except where weekly etc. rotation periods are operated e.g. one week on, one week off) and shall receive all public and annual holidays required by local law.</p> <p>d) Overtime work for non-management employees shall be reimbursed at a premium rate and the total hours worked in a week shall not exceed 60 hours on a regular basis (except where weekly etc. rotation periods are operated e.g. one week on, one week off or where G3 applies).</p>
----	---

\*Also known as the Global Manufacturing Standard for responsible production "GMS"

Subject: Sustainability	Issue Date: 1/4/2016
Document Title: <b>RB's Policy on Human Rights and Responsible Business* - Detailed Requirements</b>	Page Number: 4 of 6
Originator: Global Sustainability Director	Effective Date: <b>1/4/2016</b>



HEALTH • HYGIENE • HOME

G2	<b>Overtime:</b> Other than as permitted in G3, overtime shall be voluntary.
G3	Working hours may exceed 60 hours in any 7 day period only in circumstances where all of the following are met: <ul style="list-style-type: none"> <li>• this is allowed by national law;</li> <li>• this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>• appropriate safeguards are taken to protect the workers' health and safety;</li> <li>• the site can demonstrate that specific circumstances apply, such as unexpected production peaks, accidents or emergencies, or other specific local restrictions (to be agreed with RB's Global Head of Sustainability); and</li> <li>• requirements G1(a), (b) and (c) are complied with.</li> </ul>
G4	RB Group companies will not condone any negligence or lack of proactivity in ensuring compliant working hours at RB facilities or suppliers' facilities. Failure to comply with requirements G1, G2 and G3 above: <ul style="list-style-type: none"> <li>• at a RB facility, may result in disciplinary action and / or the dismissal of the employee(s) responsible for the non-compliance or contractual penalties or termination of the contractor; or</li> <li>• at a supplier facility, may result in requirement for immediate audit and / or remediation and potentially the immediate termination of RB's business relationship with that supplier.</li> </ul>

<b>H Remuneration</b>	
<b>Definition of supplier / subcontractor:</b> A business entity which provides the facility / company with goods and/or services integral to, and utilised in/for, the production of the facility / company's goods and/or services.	
<b>Definition of homeworker:</b> A person who carries out work for a facility / company under direct or indirect contract, other than on a facility / company's premises, for remuneration, which results in the provision of a product or service as specified by the employer, irrespective of who supplies the equipment, materials or other inputs used.	
H1	<b>Standard wages:</b> The facility / company shall ensure that wages paid for a standard working week shall meet at least the minimum requirements of applicable laws / regulations.
H2	<b>Deductions:</b> The facility / company shall ensure that any deductions from standard or overtime wages comply with applicable laws / regulations and are not made as a disciplinary measure or for the purposes of forced, bonded or compulsory labour. Deductions from wages not expressly provided for by applicable law shall not be permitted without the expressed permission of the worker concerned. Deductions for living quarters / food / goods etc. provided to employees must be reasonable and if employees choose to live / eat / buy goods outside of the facilities provided, they shall not be charged for the goods / services etc. they give up.
H3	<b>Payment of wages and benefits:</b> The facility / company shall ensure that: <ul style="list-style-type: none"> <li>a) wages, benefits, overtime (if applicable) and paid leave composition are detailed clearly and regularly; and</li> <li>b) wages, benefits, overtime (if applicable) and paid leave are rendered in compliance with applicable laws / regulations.</li> </ul>
H4	<b>Employment contract:</b> All workers shall be provided with written and understandable information about their conditions of employment before they enter employment, outlining the length of employment, working hours, wages paid, benefits provided and any costs deducted from wages for food, accommodation or other expenses.
H5	<b>Factory closure and lay-offs:</b> The facility / company shall, so far as is reasonably practicable, give reasonable notice of changes in employment to employees / employee representatives (and where appropriate to the relevant governmental authorities); and co-operate with employee representatives / governmental authorities so as to mitigate so far as is reasonably practicable the adverse effects of any closure or lay-offs.
H6	<b>Rights of contracted labour and home workers:</b> the above requirements (and those of labour / social security laws / regulations) shall not be avoided through the use of labour-only contracting, sub-contracting or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, or through excessive use of fixed-term contracts of employment.
H7	RB Group companies will not condone any negligence or lack of proactivity in ensuring compliant remuneration at RB facilities or suppliers' facilities. Failure to comply with requirements H1, H2, H3, H4, H5 and H6 above: <ul style="list-style-type: none"> <li>• at a RB facility, may result in disciplinary action and / or the dismissal of the employee(s) responsible for the non-compliance or contractual penalties or termination of the contractor; or</li> </ul>

\*Also known as the Global Manufacturing Standard for responsible production "GMS"

Subject: Sustainability	Issue Date: 1/4/2016
Document Title: <b>RB's Policy on Human Rights and Responsible Business* - Detailed Requirements</b>	Page Number: 5 of 6
Originator: Global Sustainability Director	Effective Date: <b>1/4/2016</b>



HEALTH • HYGIENE • HOME

<ul style="list-style-type: none"> <li>at a supplier facility, may result in requirement for immediate audit and / or remediation and potentially the immediate termination of RB's business relationship with that supplier.</li> </ul>
--

## **I Environmental (and public health & safety) Protection**

**Definition of Environment:** surroundings; including air, water, land, natural resources, animals, plants, humans and their interactions.

I1	The facility / company shall undertake reasonable endeavours to protect the environment and public health & safety in carrying out its operations.
I2	The facility / company shall possess and be in compliance with the requirements of all permits / authorisations / consents / approvals etc. required under applicable laws / regulations, such as: <ul style="list-style-type: none"> <li>a) site / process operation</li> <li>b) (any) use of hazardous materials</li> <li>c) water use / abstraction</li> <li>d) (any) air emissions</li> <li>e) (any) water / wastewater discharges</li> <li>f) waste management and disposal</li> </ul>
I3	The facility / company shall determine, measure and track its significant direct environmental aspects / impacts with a view to achieving continual improvements in its environmental performance (relative to production volume etc.) over time; these may include, for example: <ul style="list-style-type: none"> <li>a) water use / abstraction</li> <li>b) air emissions regulated by law</li> <li>c) water discharges</li> <li>d) hazardous and nonhazardous waste</li> <li>e) energy use and greenhouse gas emissions</li> <li>f) legal / regulatory non-compliances</li> </ul>
I4	RB Group companies will not condone any negligence or lack of proactivity in ensuring environmental protection at RB facilities or suppliers' facilities. Failure to comply with requirements I1, I2 and I3 above: <ul style="list-style-type: none"> <li>• at a RB facility, may result in disciplinary action and / or the dismissal of the employee(s) responsible for the non-compliance or contractual penalties or termination of the contractor; or</li> <li>• at a supplier facility, may result in requirement for immediate audit and / or remediation and potentially the immediate termination of RB's business relationship with that supplier.</li> </ul>

## **J Business Integrity**

J1	The facility / company shall ensure they conduct their business ethically and in compliance with all applicable laws / regulations.
J2	The facility / company shall have a business ethics policy in place prohibiting bribery, corruption and unethical business practices and shall enforce its policy.
J3	The facility / company shall comply with RB's Anti-Bribery Policy.
J4	The facility / company shall comply with RB's Code of Business Conduct.
J5	RB Group companies will not condone any negligence or lack of proactivity in ensuring that business is conducted within integrity at RB facilities or suppliers' facilities. Failure to comply with requirements J1, J2, J3 and J4 above: <ul style="list-style-type: none"> <li>• at a RB facility, may result in disciplinary action and / or the dismissal of the employee(s) responsible for the non-compliance or contractual penalties or termination of the contractor; or</li> <li>• at a supplier facility, may result in requirement for immediate audit and / or remediation and potentially the immediate termination of RB's business relationship with that supplier.</li> </ul>

## **K Management Systems**

K1	The facility / company shall implement systems to ensure compliance with the requirements of this policy.
K2	The facility / company shall have a senior member of management who is responsible for ensuring compliance with these requirements.
K3	The facility / company shall have mechanisms in place to ensure these requirements are clearly communicated to their employees and suppliers.
K4	The facility / company shall have mechanisms in place to undertake due diligence adopting a risk based approach to suppliers, and shall apply these mechanisms to suppliers and contractors.

\*Also known as the Global Manufacturing Standard for responsible production "GMS"

Subject: Sustainability	Issue Date: 1/4/2016
Document Title: <b>RB's Policy on Human Rights and Responsible Business* - Detailed Requirements</b>	Page Number: 6 of 6
Originator: Global Sustainability Director	Effective Date: <b>1/4/2016</b>



K5	The facility / company shall have mechanisms in place to monitor and audit compliance with these requirements, and in the case of suppliers or contractors of RB, shall permit RB and its agents access to the facility/company to audit or inspect it including in the event of any complaint or issue.
K6	<p>RB Group companies will not condone any negligence or lack of proactivity in ensuring there are management systems in place to ensure compliance with the requirements of this policy at RB facilities or suppliers' facilities. Failure to comply with requirements K1, K2, K3, K4 and K5 above:</p> <ul style="list-style-type: none"> <li>• at a RB facility, may result in disciplinary action and / or the dismissal of the employee(s) responsible for the non-compliance or contractual penalties or termination of the contractor; or</li> <li>• at a supplier facility, may result in requirement for immediate audit and / or remediation and potentially the immediate termination of RB's business relationship with that supplier.</li> </ul>

\*Also known as the Global Manufacturing Standard for responsible production "GMS"