

Human Rights Policy

Policy Statement

It is our policy to conduct all of our business in an honest and ethical manner. This policy describes the workplace practices and ethical behaviour we require for all workers.

We will uphold all laws relevant to Human Rights and will advance human rights through our company policies including Equal Opportunities, Health & Safety, Anticorruption, Anti-bullying & Harassment and Whistleblowing policy.

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on Human Rights; and
- provide information and guidance to those working for us on how to recognise and deal with Human Right issues.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Who Must Comply With This Policy?

This policy applies to all persons working for us (or any Group Company) or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located (collectively referred to as **workers** in this policy).

What Are The Human Right Principles?

Full details of the principles set out within the United Nations Universal Declaration of Human Rights can be found at <http://www.un.org/> this policy focuses on the following specific principles:

- Labour
- Health & Safety
- Environmental

Labour

APC Technology Group:

- Prohibits the use of forced, bonded, indentured or involuntary prison labour
- Employs workers who are at least 16 years old
- Sets work hours to comply with local law
- Complies with applicable wage laws, regulations and relevant collective bargaining agreements including those related to minimum wages, overtime hours, and legally mandated benefits.
- Maintains workplaces free of physical or mental abuse or harassment
- Maintains workplaces free of unlawful discrimination and harassment in all its forms, including that related to race, gender, sexual orientation, age, pregnancy, caste, disability, union membership, ethnicity, religious beliefs or any other factors protected by law.

- Respects employees' voluntary freedom of association
- Encourages open communication and direct contact between management and workers in situations where representation and collective bargaining are restricted by law.
- Respects the special needs of individual employees, including those who are pregnant or are returning to work after childbirth
- Respects employees' rights to privacy of their personal information

Health And Safety

APC Technology Group

- Minimises worker exposure to potential safety hazards through proper design, engineering and administration controls, preventive maintenance and safe work procedures. Provides and properly maintain machine safeguards, interlocks and barriers. Workers are not to be disciplined for raising safety concerns.
- Maintains appropriate emergency plans and response procedures
- Manages, tracks and reports occupational injury and illness
- Provides clean toilet facilities, and access to water and sanitary food preparation and storage facilities
- Strives to continuously improve health and safety performance in all of its operations.

Environmental

APC Technology Group

- Minimises adverse effects of our operations on the community and environment, while safeguarding the health and safety of the public.
- Acquires, maintains and complies with the appropriate environmental permits, registrations and laws.
- Implements programmes to conserve water and energy and reduce waste.
- Identifies and manages potentially hazardous materials used in our operations to ensure safe handling, movement, storage, recycling or reuse and disposal of such materials.
- Monitors, treats and controls air emissions, water waste and waste as required prior to discharge or disposal.

How To Raise A Concern

You are encouraged to raise concerns about any issue relating to Human Rights at the earliest possible stage to the HR Manager.

If you are unsure about whether a particular issue breaches the Human Rights Policy, raise it with your manager or the HR Manager.

Protection

We are committed to ensuring no one suffers any detrimental treatment as a result of complying with this policy, or because of reporting in good faith their suspicion that failure to comply with this policy has occurred or will occur in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Training And Communication

Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.

Who Is Responsible For This Policy?

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Monitoring And Review

The HR manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

All workers expected to comply with this policy, and submit their questions or concerns to their manager or the HR Manager.

Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the HR manager.