

HUMAN RIGHTS POLICY

Compliance Policies - Policy 12.1- Human Rights Policy

Approved by	The Board of Managers
Origin Date:	March 13, 2016
Last Revised Date:	March 4, 2016
Policy Owner(s):	Acting Group Head of Compliance
Contact(s):	Head of Compliance International

In this document, the “Company” or “ERG” means Eurasian Resources Group S.a.r.l. and includes, where applicable, all subsidiaries.

1. Policy Objective

1.1. The policy’s objectives are:

- 1.1.1. to ensure that the Company complies with law and regulation on human rights;
- 1.1.2. to provide Company employees with clear requirements and universal guidelines on complying with human rights;

1.2. The policy sets out:

- 1.2.1. the Company’s requirements and standards on aspects of human rights, relevant to its operations;
- 1.2.2. roles and responsibilities in detecting and preventing abuse of human rights, design of controls and incident reporting.

1.3. This Policy should be read and applied in conjunction with ERG’s Code of Conduct and internal policies.

2. Scope

2.1. This policy applies to:

- 2.1.1. the Company and its employees (including temporary and contract staff) ;
- 2.1.2. all business dealings in all jurisdictions within which the Company conducts business; and
- 2.1.3. all actual or suspected human rights incidents involving employees.

3. Definitions

- 3.1. The Board – the Board of Managers of Eurasian Resources Group SARL
- 3.2. Human Rights – as defined by the Universal Declaration of Human Rights.

4. Policy Statements

- 4.1. The ERG Human Rights Policy is guided by international human rights principles set out in, *inter alia*, the Universal Declaration of Human Rights (1948), the International Covenant on Civil and Political Rights (1966), the International Covenant on Economic, Social and Cultural Rights (1966) International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work (1998), European Convention on Human Rights and the EU Charter on fundamental rights.
- 4.2. ERG respects human rights. Respect for human rights is fundamental to the Company’s sustainability and the sustainability of the communities in which we operate. ERG is working to identify, prevent and mitigate potential adverse human rights impacts resulting from, caused by or linked to our business through implementing the processes recommended by the UN Guiding Principles on Business and Human Rights. Where the Company has caused or contributed to adverse human rights impacts we will contribute to their prevention, mitigation and remediation, as appropriate. The Company’s standards on human rights particularly relevant to our industry are set out in Appendix 1 to this Policy.
- 4.3. ERG provides a grievance mechanism for reporting of human rights incidents by its employees and external stakeholders via its whistleblowing hotline. All human rights incidents will be recorded, assessed and investigated in accordance with the Company’s Code of Conduct and internal procedures.
- 4.4. Duly authorized Company internal investigators shall have the right to enter any Company premises, be given access to any information requested, and have access to all staff (with reasonable notice) as part of the investigation process. The rights of individuals will be respected in an investigation.



- 4.5 To promote continuous improvement, each incident investigation should end with lessons learnt and practical, appropriate and proportionate recommendations for improvement, with the objective to avoid similar future situations.
- 4.6 All employees should be given training on the Human Rights Policy and relevant regional procedures. It is an employee's responsibility to attend such training when it is provided.
- 4.7 Any employee found to have violated Human Rights Policy may be subject to disciplinary action, which may include summary dismissal. A breach of the law can additionally be subject to civil or criminal penalties. Local penalties may also apply for community human rights breaches.
- 4.8 ERG will work with third parties which have comparable standards on human rights to those of ERG and, by contractual warranties, oblige them to apply these standards.

5. Responsibilities

- 5.1. The Board is responsible for establishing this Policy.
- 5.2. The Compliance Department of the respective Region is responsible for :
 - 5.2.1. Providing guidance and advice to the Regional Management with regard to the implementation of this Policy and oversight of the implementation of this policy.
 - 5.2.2. Monitoring of compliance with this Policy
 - 5.2.3. Reporting requirement: Preparation of periodical reports on the status of implementation and adherence to the Policy.
- 5.3. The Regional Management is responsible for effective implementation of this Policy in their respective areas of responsibility and make sure that adequate controls are implemented to ensure on-going compliance as well as ensuring that their employees are made aware of this Policy.
- 5.4. It is the responsibility of each Employee to comply with the terms of this policy and to report known or suspected breaches of this Policy within the company, in accordance with the Company's internal policies.

6. Monitoring

- 6.1 The Group General Counsel should, on an annual basis, report on the status of compliance with this Policy to the Compliance Committee of the Board. The Regional Compliance departments should periodically, but not less than twice per year, report on the status of compliance with this Policy to The Group General Counsel.
- 6.2 Internal Audit should periodically review compliance with this Policy and report any deficiencies and respective recommendations to the Group Management and the Compliance Committee of the Board.

7. Non-compliance

- 7.1 Any non-compliance with the Policy should be documented and reported to the Regional Compliance Department or the ERG hotline.
- 7.2 Employees who violate this Policy will be subject to disciplinary measures subject to local law, up to and including termination of their employment.

8. Revision Process

- 8.1 This ERG Policy will be updated periodically (but not less than once every 2 years) to reflect any change in business requirements.
- 8.2 All change requests should be directed to one of the document owners (contacts).
- 8.3 Material changes to this ERG Policy must be approved by The Board.

Version	Last revision date	Approved by	Date of approval	Comments
1.0	04.03.2016	The Board	13.03.2016	



6.3 Appendix 1

Human Rights Standards

This list outlines ERG's key standards on topics relevant to human rights. This list is not exhaustive and should be read in conjunction with ERG's policies and procedures as outlined in paragraph 1.3 of this Policy.

1. Freedom of Association and Collective Bargaining

- 1.1 ERG respects our employees' rights to the extent granted by the applicable law to join, form or refrain from joining a labour union, without any fear of reprisal, intimidation or harassment and to participate in collective bargaining.
- 1.2 Where employees are represented by a legally recognised union, ERG seeks to establish a constructive dialogue with their chosen representatives and to engage in collective bargaining in good faith.

2. Safe and Healthy Work Conditions

- 2.1 ERG strives to provide safe and healthy work conditions and to comply with applicable health and safety laws and regulations.
- 2.2 ERG is working with its employees and stakeholders to improve health and safety conditions, including the identification of hazards and the remediation of health and safety issues.

3. Workplace Security

- 3.1 ERG strives to maintain workplaces which are free from violence, harassment, intimidation and other unsafe or disruptive conditions, whether due to internal or external conditions.
- 3.2 ERG aims to ensure that the provision of security to our operations and our engagement with government and private security forces is in accordance with local law.
- 3.3 ERG strives to balance the need for the safety and security of our employees, assets, operations and communities while respecting human rights, in particular with regard to use of force.

4. Labour standards

- 4.1 ERG will abide by all applicable labour and employment laws of the countries in which it operates.
- 4.2 ERG prohibits use of forced or compulsory labour or human resources sourced by human trafficking.
- 4.3 ERG prohibits use of child labour and the labour of persons under the legal age for work.
- 4.4 ERG aims to provide competitive compensation to employees, relative to its industry and benchmarked against local market assessments.
- 4.5 ERG complies with applicable wage, work hours, overtime and benefits laws and regulations of the countries in which it operates and will abide by agreements negotiated with our employee representatives.

5. Equality, Diversity and Non-discrimination

- 5.1. ERG is committed to workplace equality and diversity and to treating all employees and stakeholders fairly and with respect.
- 5.2. ERG strives to achieve workplaces which are free from any form of violence, abuse, harassment or discrimination on the basis of race, sex, colour, national or social origin, religion, age, gender, disability, sexual orientation, political opinion or any other status protected by applicable law.
- 5.3 ERG upholds equal opportunity for all employees. Recruitment, hiring, placement, training, compensation and advancement are based on merit, qualifications, performance, skills and experience.

6. Indigenous Peoples

- 6.1 ERG respects the rights of Indigenous Peoples, as defined by applicable national and emerging international standards.

7. Communities

- 7.1 ERG respects the rights, cultures, heritage and customs of the diverse countries and communities in which ERG operates. ERG endeavours to engage with communities to understand the potential implications of its activities and work to optimize benefits and reduce impacts for communities and the wider economy.
- 7.2 ERG engages with community stakeholders to ensure that it is listening to, learning from and taking into account their views in the conduct of our business, including dialogue on human rights issues. ERG will inform and engage appropriately with affected and potentially affected persons on risks, impacts, remediation and risk mitigation measures and on-going performance monitoring.
- 7.3 ERG is committed to creating sustainable economic opportunity and fostering goodwill in the communities where it operates, through locally relevant and led initiatives.
- 7.4 ERG works with host governments, which have the primary responsibility for promoting and protecting national and local human rights, to strengthen their capacity.
- 7.5 ERG makes significant investments annually in developing local infrastructure and utilities of the communities where it operates, contributing to the establishment and improvement of schools, medical, community and sports facilities and making charitable donations, in accordance with the Company's Code of Conduct.
- 7.6 ERG seeks to avoid involuntary resettlements. In situations where this is unavoidable, ERG constructively engages with community representatives and comply with national and regional governmental guidelines and international human rights standards on resettlement.

8. Environmental Standards

- 8.1 ERG manages its operations in accordance with national and local environmental laws and regulations. The Company is working towards optimizing the sustainability and minimizing the environmental impact of its operations, drawing on emerging best practice.

9. Anti-bribery and corruption

- 9.1 ERG recognizes that corruption hinders business and social development, especially in emerging economies. ERG has a zero tolerance policy regarding corruption as set out in the ERG Anti-bribery and Corruption Policy.