



HUMAN RIGHTS & LABOUR POLICY





INTRODUCTION

The SFA Group's employees are of great value and the key to our success. The Group must strive to provide a workplace where employees can fulfil their potential in an open and inspirational working environment. We must maintain a strong commitment to high standards that deliver a fair, respectable and safe workplace for all employees in the Group.

Respect for human rights is a prerequisite for all of the Group's activities and the SFA Group does not tolerate any infringement of these rights, neither in its activities nor in those of its suppliers, subcontractors and partners.

The SFA Group adheres to the international commitments of the United Nations for the protection and promotion of human rights: the Universal Declaration of Human Rights (1948), the Declaration on the Elimination of All Forms of Discrimination against Women (1967), as well as the Declaration on the Rights of the Child (1959), the International Covenant on Civil and Political Rights (1966) and the United Nations International Covenant on Economic, Social and Cultural Rights (1966):

SFA Group is committed to the principles of the core conventions of the International Labour Organisation (ILO) guaranteeing: freedom of association, freedom of expression and the principles of collective bargaining, abolishing the use of forced and compulsory labour, prohibiting child labour and exploitation and combating discrimination.

The SFA Group's commitment also applies in countries that have not yet ratified these conventions

In the event of a conflict of standards with the laws applicable in the countries in which it operates, the SFA Group endeavors to apply the provisions that best protect human rights.

PURPOSE AND SCOPE

The purpose of this policy is to define the labour and human rights standards to which all employees in the SFA Group are entitled, irrespective of the country in which they work.

This policy applies globally to the management, employees and contract workers of all entities in the SFA Group.

REQUIREMENTS

1. NON-DISCRIMINATION

1.1. The SFA Group does not tolerate any form of discrimination against our employees based on gender or age, race, culture or national origin, union activity, sexual preference, disability, political opinion or religion.

1.2. Any employment-related decisions, from hiring to termination and retirement, must be based solely on lawful, non-discriminatory criteria.

2. HARASSMENT

2.1. SFA Group companies must protect workers from any acts of physical, personal, discriminatory, psychological, bullying or sexual harassment, abuse or threats in the workplace by either their fellow employees or managers.



3. FORCED LABOUR

3.1 The SFA Group does not tolerate any form of forced labour including bonded labour, indentured labour and slave labour, or human trafficking. Workers must be allowed to move around freely and leave their place of work when their working hours end.

4. CHILD LABOUR

4.1 The SFA Group does not tolerate the hiring of child labour under any circumstances. The minimum age for full-time employment must be 15 or the legal minimum age for employment under Applicable Law, whichever is higher. Where the applicable local minimum working age is 14 in accordance with exceptions for developing countries, this lower age will apply. The Group must not hire employees under the age of 18 for positions requiring hazardous work that could jeopardise health, safety or morals.

5. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

5.1 The SFA Group must respect employees' rights to form, join or not join a labour union, or other organisation of their choice, and to bargain collectively in support of their mutual interests without fear of punitive actions such as intimidation, harassment or termination of employment.

5.2 The SFA Group prohibits all acts of interference in trade unions.

5.3 The SFA Group facilitate the collective bargaining with the trade union representatives. Within the context of this bargaining, the SFA Group provides trade union representatives with the information required for the exercise of their rights.

6. FREEDOM OF EXPRESSION

6.1 All employees have the right to file grievances without penalty or retaliation.

7. WORKING CONDITIONS

7.1. The SFA Group must adhere to the stricter of Applicable laws or industry standards, relating to minimum wages, working hours, overtime and benefits.

7.2. In the event of major layoffs, the SFA Group must, as a minimum, satisfy applicable laws and industry standards.

8. OCCUPATIONAL HEALTH AND SAFETY

8.1 The SFA Group shall protect the health and safety of all its employees in the workplace.

8.2 The SFA Group shall maintain the highest safety and health standards in accordance with national requirements, taking into account its knowledge of the particular hazards. It shall also make available to all employees information on the safety and health standards applicable to their activities.

8.3 All employees have the right to access to toilets, rest facilities and drinking water at the workplace.

9. LEAVE

9.1 The SFA Group must ensure that all employees have the right to sick leave and annual holiday, as well as parental leave for employees who have to care for a new-born or newly adopted child as provided by national legislation. Employees who take such leave must not, as a result, face dismissal or threat of dismissal.

10. EMPLOYEE CONTRACTS/LETTERS

10.1 All employees must be provided with a written, understandable and legally binding employment contract/letter.



ROLES AND RESPONSIBILITIES

SFA GROUP'S ROLES AND RESPONSIBILITIES	
EXECUTIVE BOARD	RESPONSIBLE FOR POLICY APPROVAL.
CSR GROUP COMMITTEE	OWNS, ENDORSES AND ENSURE THE IMPLEMENTATION OF THE POLICY.
CSR GROUP MANAGER	DRIVES THE IMPLEMENTATION OF THE POLICY, PROVIDES SPECIFIC ADVICE ON LABOUR AND HUMAN RIGHTS ISSUES AND DILEMMAS, AND ENSURES THAT LABOUR AND HUMAN RIGHTS ISSUES ARE IDENTIFIED AND ADDRESSED. AUDITS, REVIEWS, MEASURES AND REPORTS ON LABOUR AND HUMAN RIGHTS PERFORMANCE.
LOCAL CSR REPRESENTATIVES	RESPONSIBLE FOR SHARING OF POLICIES WITHIN THEIR BUSINESS UNITS
MANAGEMENT, EMPLOYEES, WORKERS OF ALL ENTITIES IN THE SFA GROUP	RESPONSIBLE FOR ADHERING TO THIS POLICY. COMPLY WITH THE LETTER AND SPIRIT OF THE POLICY. ENGAGE AND TAKE RESPONSIBILITY FOR ENSURING THAT ALL INITIATIVES ARE DEVELOPED IN LINE WITH THE POLICY.




DEVIATIONS

No exemptions from this policy can be granted unless there are exceptional circumstances or the policy is obviously not applicable. All requests for exemptions must be made in writing to the Executive board. The board must assess and decide on each request individually. Exemptions must be duly logged and documented.

POLICY REVISION


This policy must be reviewed every two years in order to ensure its continued adequacy and relevance. It may be amended at any time with the approval of Executive Board. In the event of any discrepancies between the English version of this policy and a translated version, the English version will be binding.


ASSOCIATED POLICIES

-  Ethics Charter
-  Discrimination & harassment Policy
-  Modern Slavery Act

CONTACT

For more information, please contact the local CSR representative or [CSR Committee](#).

Date: 22.11.2022
 Signed 
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CSR COMMITTEE

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