

At Access Engineering Systems we are committed to respecting the Human Rights of all people throughout our operations and our value chain. This Policy is based upon our intention to conduct business legally, ethically and with integrity always. This Policy is further supported by related Company policies and with due diligence and remedy procedures to ensure respect for human rights and to avoid complicity in violations

This Policy is applicable to Access Engineering Systems, each of our subsidiaries and affiliates, all employees and our value chain.

## General Principles

The following principles are covered by this procedure:

- ✓ Freely chosen employment
- ✓ Prevention of underage labour and protection of young workers
- ✓ Organisation of working time
- ✓ Fair wages and benefits
- ✓ Fair treatment and anti-harassment
- ✓ Non-discrimination
- ✓ Freedom of association
- ✓ Working conditions and employee well-being
- ✓ Privacy of personal information

## Principles

### Freely chosen employment

Forced labour shall not be used, including bonded and trafficked labour. Working for Access Engineering Systems is voluntary, and employees are free to leave Access Engineering Systems upon their contractual or statutory notice period.

As part of the hiring process, workers must be provided with a written employment agreement that contains a description of terms and conditions of employment.

A probationary period must not exceed 3 months.

Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment, unless the holding of work permits is required by law.

## **Prevention of underage labour and protection of young workers**

Access Engineering Systems does not employ people under the age of 18 years.

The use of legitimate workplace apprenticeship and learning programs, which comply with all laws and regulations, is supported.

## **Organisation of working time**

Working hours are limited to a maximum of 60 hours per week including overtime. A working week is not to exceed 60 hours including overtime, except in emergency or extraordinary situations.

Workers must have at least one day off every seven days, which is 24 consecutive hours off in the same calendar day after six consecutive days of work.

Overtime is on a voluntary basis or in the case of emergency or extraordinary situations, upon management request when volunteers are not sufficient to cover the business need, in full compliance with legislation and collective bargaining agreements.

Breaks must be in compliance with award conditions.

## **Fair wages and benefits**

Access Engineering Systems seeks to offer competitive wages, salaries and benefits packages based on industrial awards. At a minimum, Access Engineering Systems complies with all applicable industrial laws and collective bargaining agreements, including minimum wages, holidays, vacation, personal leave, and legally mandated benefits.

All time worked must be paid. Workers must be paid in a timely manner and in accordance with local laws including in the case of resignation. All workers must receive an itemised pay slip for every pay period, showing the basis on which, they are paid.

When a contract is terminated, all due wages must be fully paid, and any deduction documented.

Wage deductions are permitted for the following situations;

- Late arrival or work suspension due to disciplinary measures - the wage deduction must be proportional to the reduction of working time.

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- Resignation and a notice period not respected – in addition to the wage deduction which is proportional to the reduction of working time.
- Any prescribed fee for insurance excess in the event of negligent damage to property, plant or equipment during the performance of duty.
- Unauthorised use of or purchase or spend using company credit cards, facilities and accounts.

## **Fair treatment and anti-harassment**

All workers must be treated fairly. Access Engineering Systems does not tolerate any mistreatment of a worker by another worker, and this includes verbal, psychological, sexual or physical bullying and harassment, or any behaviour which disrupts or interferes with another's work performance or that creates an intimidating, offensive or hostile environment.

## **Non-discrimination**

Access Engineering Systems maintains a culture free of discrimination, where individuals are treated with respect and dignity, regardless of their race, colour, ethnic background or national origin, age, gender, physical characteristics, disability, political opinion or affiliation, religion, sexual orientation, marital or maternity status or union affiliation, or any other non- job-related personal characteristic.

Access Engineering Systems is committed to attracting, developing and retaining its workforce respecting diversity and providing equal opportunities to all employees based on their behaviour, skill and abilities. Decisions concerning recruitment and selection, job assignment, remuneration, rewards, opportunity for training and development, and transfer or promotion must be based on a fair assessment of an individual's qualifications, skills and ability, as well as past and current performance.

## **Freedom of association**

Workers are free to choose whether to join lawful associations including unions. Access Engineering Systems does not restrict or interfere with workers' efforts to join a lawful association of their choice, and this includes any behaviour that involves threatening, interrogating, spying on, penalising or discriminating workers.

Access Engineering Systems respects the right of all workers to associate freely, to form and join trade unions of their own choice, to bargain collectively and to

# Human Rights Policy



engage in peaceful assembly, in accordance local and federal laws. Workers and their representatives shall be able to communicate openly with each other and with management regarding working conditions without fear of reprisal, intimidation, discrimination or harassment.

## **Working conditions and employee well-being**

Access Engineering Systems is committed to providing a safe and healthy work environment conducive to worker well-being by meeting international standards for health and safety management systems. Access Engineering Systems encourages proactive attentive and safe behaviour in the workplace and encourages worker suggestions to eliminate the potential causes of accidents or injury.

Health and safety related information must be clearly posted in the facility and workers must be provided with an appropriate workplace health and safety training.

## **Privacy of personal information**

Access Engineering Systems respects and protects the confidentiality of personal employee information against unauthorised use or disclosure. Personal data can include such items as contact information, health and medical information, birthdates, and other similar information. We comply with relevant privacy and data protection laws and we obtain personal information legally.

Individuals are provided with reasonable access to their personal information and are given the opportunity to review and correct it where appropriate. Sharing of personal information is limited to those situations where Access Engineering Systems has a legal obligation to do so, or where the employee has authorised Access Engineering Systems to share the information, or on a need to know basis with authorised parties.

Information relating to employees or to business partners must be acquired ethically and lawfully; it must be used solely for the purpose to which the parties concerned have consented. Access Engineering Systems entities must take the necessary steps to protect the confidentiality of such information.

All employees are required to maintain the confidentiality of protected or sensitive information acquired in the course of their work, except when such disclosure is either duly authorised in compliance with Access Engineering Systems policies or legally required.

## **Reporting of violations and promise of non-retaliation**

Access Engineering Systems promotes a “speak up” culture, allowing everyone to express, in good faith and without fear of retaliation, any concern they might have of a potential violation of Company policy or values.

All workers must be aware of the channels available to them to report any case of potential non-compliance with this procedure. The reporting of issues must follow the process described in the Access Engineering Systems Code of Conduct.