

# Ethical and Human Rights Policy.

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INTERNAL STAFF POLICY

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# 1. Introduction

McInnes Wilson Lawyers (the Firm) exhibits its commitment to acceptable human rights standards in its employment practices at all of its operations. Ethical best practice and accepted human rights principles are to be adhered to as a minimum at all times, subject to applicable national legislation and regulations.

# 2. Purpose

The Firm's management of human rights issues is based on the totality of our efforts and not on a single activity as the Firm is committed to the highest standards of business integrity, ethical values and professionalism in all its activities.

# 3. Scope, Responsibility and Enforcement

This policy will apply to employees at every level of the firm. Failure to comply with the guiding principles outlined herein could result in disciplinary action being instituted. We have a procedure for protected disclosures should an employee suspect non-adherence to any of our business principles.

# 4. Guiding Principles

In order to protect the inherent dignity of its employees, the Firm subscribes to guiding principles. These guiding principles will foster greater awareness of human rights issues throughout the Firm. This will heighten our abilities to identify and manage human rights issues in our business.

# 5. Health, Safety and Security

The Firm is committed to providing a safe and healthy working environment, to minimising the risk of accidents, personal injury and adverse health impacts, and to continuous improvement in health and safe performance. The Firm will provide the facilities, training and protective equipment necessary to ensure a safe workplace for all our employees. We will facilitate reporting of unsafe acts without fear of reprisal. The Firm is committed to ensuring the physical security of all its employees.

# 6. Equal Opportunity and Diversity

The Firm will treat every employee with respect and dignity and will not tolerate discrimination or harassment of any kind. Employment-related decisions are based on a variety of relevant factors such as qualifications, skills, performance and relevant experience.

# 7. Non-Discrimination

The Firm condemns unfair discrimination in employment on the basis of race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation/identity, age, disability, religion, family responsibilities/parental status, belief, culture, language, national extraction, social origin and political opinion and physical appearance. We will develop and provide training on procedures to ensure best recruitment practices to guarantee adherence to this policy. Employees will be coached, trained and educated which will enable them to perform in line with our standards, values and principles.

## 8. Child Labour

The Firm will comply rigorously with all local legislation and regulations and will not employ children under the minimum legal age limit for starting work.

## 9. Forced Labour

The Firm will not use any form of forced or involuntary labour, and refrains from practices that can give rise to a risk of involuntary labour.

## 10. Freedom of Association and Collective Bargaining

The Firm respects its employees' right to associate freely, form or join organisations of their choosing and to bargain collectively in accordance with recognised international instruments, local laws and regulations, in full freedom and without fear of reprisal, intimidation or harassment. The Firm also recognises its employees' right to refrain from collective representation. The Firm is committed to conduct collective bargaining with freely chosen employee representatives of a legally recognised union.

## 11. Working Hours

The Firm is committed to assuring full compliance with applicable laws, regulations, and relevant collective agreements concerning working hours and overtime, leave and minimum rest periods. It is company policy not to make systematic use of extensive overtime work and any overtime hours will be appropriately compensated according to individual terms of employment, applicable regulation and relevant collective agreements.

## 12. Compensation

The Firm will provide its employees with compensation and employment related benefits on a competitive basis. We recognise wages are essential to meeting employees' basic needs and will at least pay the minimum wage and mandated benefits required by local law.

## 13. Fair Procedures

The Firm is committed to uphold the privacy of our employees. The Firm undertakes to follow fair disciplinary, grievance and dismissal procedures which are provided for by company policies including, upon request, the provision of exit conversations for employees leaving the company.

## 14. Underlying Policies

This policy reinforces our existing policies, processes and activities that support our human rights values and commitments, which include specific policies on corporate governance, code of conduct, social responsibility and information security.