

	<h1>Human Rights Policy</h1>			No.:	TSL-POL-GRP-028
				Version:	01
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Document Type: Policy	Company: TSL	Document Owner: Head of ESG	Document Approver: Group Chief of Staff	Document Classification Public	

1.0 Introduction

- 1.1** TSL firmly believe that every individual, regardless of their background or circumstances, is entitled to the fundamental rights and freedoms that define our shared humanity.

In a world marked by diversity, where people from various cultures, backgrounds, and walks of life come together to shape our society, we understand the vital importance of respecting, protecting, and championing the rights of all individuals involved in our projects.

Our commitment to human rights is at the very core of our corporate values and shapes the way we conduct business, interact with our stakeholders, and contribute to the communities in which we operate.

In this Human Rights Policy Statement, we outline our unwavering dedication to upholding human rights in every facet of our operations. We pledge to conduct our business with integrity, ensuring that our employees, suppliers, partners, and communities experience a workplace and project environment that is grounded in principles of fairness, dignity, and equality.

2.0 Scope

- 2.1** TSL is an international company with a presence in a growing number of countries, where we employ large numbers of people on our sites and in our businesses, whether by recruiting them directly or through our subcontractors.

While the institutional context and working environment can vary markedly from one country to another, we have a duty everywhere to observe the rights of those persons and of local communities that might be affected by our projects and activities.

We will apply local regulations and a common set of principles and guidelines concerning human rights in all countries where we operate.

- 2.2** This policy sets forth a comprehensive framework that extends its purview to encompass all stakeholders involved in our construction business, both domestically and internationally. This policy applies to our employees, subcontractors, suppliers, clients, and the communities in which we operate.

2.3 Main International Conventions & Standards

We operate in accordance with the following.

- The Universal Declaration of Human Rights (UDHR).
- The International Covenant on Civil and Political Rights (ICCPR).
- The International Covenant on Economic, Social and Cultural Rights (ICESCR).
- The Fundamental Conventions of the International Labour Organisation (ILO).
- The OECD Guidelines for Multinational Enterprises.
- The United Nations Guiding Principles on Business and Human Rights.

- 2.4** TSL companies are faced with local contexts which vary greatly from one country to another, and which are not necessarily under their control, especially if their presence there is new, can now rely on explicit and specific recommendations to prevent the risks of breaches of human rights.

These guidelines constitute benchmarks to encourage employees dealing with human rights issues to take stock of their entity's practices and to identify areas for improvement as a **progressive improvement approach**.

They will be implemented alongside initiatives to raise awareness, training, and the sharing of information on best practice, in order to develop a culture of prevention in this area – as in the area of safety, for example.

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3.0 Suppliers

3.1 TSL are a contractor management company and will employ specialist construction parties to undertake the various parts of a project aligned to their specialism. TSL recognises that the majority of labour and people employed for a project will be by their suppliers / sub-contractors / supply chain parties.

TSL expects its suppliers / sub-contractors / supply chain members to adopt the progressive improvement approach with human rights in the regions they operate.

Suppliers must work in accordance with this policy and where unable to do so must report this to the TSL Head of ESG to discuss the implementation of safeguards and how improvements can be made.

4.0 Accessibility & Transparency of the Policy

4.1 TSL operates with a steadfast commitment to transparency in all matters pertaining to human rights. We firmly believe that transparency is the bedrock upon which trust is built, and this principle guides our every action.

Our Human Rights Policy is readily accessible to all stakeholders, providing a clear and concise roadmap for how we uphold and champion human rights within our operations. We are committed to openly communicating our human rights objectives, progress, and challenges, both internally and externally.

This transparency extends to our supply chain, where we work closely with suppliers and partners to ensure they share our dedication to human rights standards. Additionally, we engage with our employees and communities transparently, fostering an environment where concerns can be raised without fear of reprisal.

4.2 Protecting human rights now forms part of our ESG strategy and will be invested in, monitored, and reported on aligned with our other ESG commitments.

5.0 Support Services

5.1 TSL take any reported human rights issue with utmost seriousness, and our priority is to provide comprehensive support services to those affected.

Our specialist team is readily available to listen, investigate, and address any concerns promptly and impartially. Employees, subcontractors, or any stakeholders who encounter human rights issues are encouraged to come forward without fear of retaliation.

We maintain strict confidentiality throughout the process and offer various avenues for reporting, to ensure that individuals can express their concerns comfortably.

Once a concern is reported, our team takes immediate action, engaging in thorough investigations, and implementing corrective measures where necessary. Furthermore, we offer access to counselling services, legal assistance, and medical support for those affected by human rights violations.

Our commitment to providing a safe and supportive environment extends to cooperation with external organisations and experts, as required, to resolve issues effectively. At TSL, we stand firmly behind our pledge to uphold human rights, and our support services are integral to this commitment, ensuring that everyone associated with our business is treated with respect and dignity.

6.0 Labour Migration and Recruitment Practices

6.1 Introduction

The significance of labour migration and recruitment as a human rights issue cannot be overstated. As businesses increasingly rely on a global workforce, the human rights implications of these practices come to the forefront. Labour migration and recruitment touch upon the very essence of human dignity, equality, and justice.

First and foremost, these processes have a direct bearing on the rights of individuals to work in conditions of their choosing, free from discrimination, coercion, or exploitation. The vulnerability often associated with migrant

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workers, including the risk of forced labour, human trafficking, and debt bondage, underscores the importance of robust human rights protections throughout recruitment and employment.

Furthermore, labour migration involves the crossing of international borders, implicating the rights to freedom of movement and non-discrimination. Discriminatory practices in recruitment and employment can lead to violations of these rights.

Labour migration and recruitment also carry broader social and economic consequences. The fair treatment of migrant workers and the respect for their rights contribute to social cohesion, economic stability, and the overall well-being of societies. In contrast, human rights abuses in these areas can lead to social unrest, compromised workplace safety, and negative impacts on communities.

6.2 Recruitment Fees & Debts

- No fees should be charged to candidates at any stage of the selection, recruitment, and deployment process.
- All contracts with recruitment agencies should include a “no fees” policy.
- Recruitment agencies should be transparent to user enterprises with regard to their practices, in particular the use of any agents/subagents and their costs and terms of engagement.
- TSL, its suppliers and its recruitment agencies should ensure that candidates are made aware that no fees should be charged at any stage of the recruitment process.
- Confidential channels for reporting complaints about fees should be made available to migrant workers.

6.3 Contract Substitution

- TSL strictly prohibits the use of coercion, deception, or omission as part of the worker recruitment process.
- Migrant workers should be provided with written contracts in a language they understand, with all terms and conditions explained clearly prior to departure.
- TSL ensures that all the relevant information on workers’ terms and conditions of employment and living arrangements are adequately communicated to workers by recruitment agencies, brokers, or itself.

6.4 Workers Documents

- TSL and its suppliers must not withhold workers’ personal travel or identity documents or any other personal items.
- TSL and its suppliers should provide safety box (upon request) for every worker to safeguard personal documents and valuable items.
- Original documents should be used by TSL only when strictly required for the purpose of registration with the national or local authorities. The documents should be promptly returned to the workers at the end of the process.
- Workers should have the freedom to terminate employment (provided they give reasonable notice) at any time without administrative or financial penalties (such as withholding or nonpayment of wages). The freedom to terminate employment should be mentioned in their employment contracts.

7.0 Living Conditions

7.1 Introduction

When companies make accommodation available to workers working on their sites, they must guarantee the physical security and safety of the occupants. The accommodation must satisfy the workers’ basic needs (namely, supply of and access to potable water, sanitary facilities, hygiene, privacy, etc.).

This section of the policy concerns fixed accommodation made available to workers. It sets out the conditions to be observed and the steps to be taken to guarantee decent accommodation conditions in accordance with international recommendations on this subject.

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7.2 Freedom of Movement

- TSL and its suppliers should not keep identity documents. If migrant workers specifically request that the employer holds their documents for safekeeping, there should be clear and simple procedures for workers to take back their documents at any time.
- TSL and its suppliers should provide a safety box (upon request) for every worker living in the accommodation.
- TSL and its suppliers should ensure that any restriction on workers' ability to move freely in and out of the accommodation is limited to what is strictly necessary and duly justified.

7.3 Freedom of Consultation & Grievance

- Grievance mechanisms are available and accessible to workers.
- TSL strive to establish a dialogue with the workers concerning the accommodation arrangements in the living facilities.
- TSL allow for reporting of issues through email and site management. Any issues will be dealt with confidentially and with appropriate parties.

7.4 Labor & Accommodation

- TSL will provide safe, clean, and hygienic workers' accommodations, with potable and running water and adequate sanitary facilities, as well as temperature-control equipment where necessary.
- TSL will provide workers with personal space and ensure an adequate level of privacy. Where applicable TSL or its suppliers should also provide a safety box for every worker living in the community.
- All parties should respect all relevant building regulations, particularly regulations related to multiple-occupancy dwellings.
- TSL shall implement adequate management systems to ensure that facilities remain clean and safe at all times. TSL expects its suppliers to follow the rules of facilities and support maintaining a safe and clean site.
- TSL shall provide services such as laundry, Internet, etc., when possible, at no cost to workers. When services in labour communities are not free (e.g., groceries, phone services, etc.), TSL should not make any profits on these sales.
- TSL and its suppliers should take account of migrant workers' diversity in their dietary needs, develop, or promote appropriate meals when possible, and provide accurate information regarding food.

8.0 Working Conditions

8.1 Introduction

In the context of our operations, we ensure that our employees are guaranteed: health and safety with a zero incident / event objective and a balanced management system in an environment free of discrimination.

This part deals with the potential risks of breaches of fundamental employment rights that could result from a lack of vigilance concerning conditions of employment. For each of these topics, the guidelines detail the approach and the actions to be taken to guard against the risks of breaches of workers' fundamental employment rights at their place of work.

8.2 Working Hours

- TSL and its suppliers should respect national legislations on working hours and overtime, where they exist. The limitations on overtime shall be respected, even if an employee requests to work additional hours.
- Records of working hours per week should be kept and monitored by the employing company (TSL or the supply chain party).
- Overtime hours should be remunerated at least at the same rate as normal working hours
- Employee should have at minimum one rest day per week, except for specific types of work or situations, for which special rules on working hours and rest periods may apply.
- Employees should have access to restrooms and should be allowed breaks during their workday.

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- Rules on working hours and rest and break periods should be communicated to workers, in an accessible and understandable format at the outset of the employment relationship.

8.3 Wage Levels

- TSL and its suppliers should respect minimum wage national legislations where they exist.
- The level of wages should correspond to the number of hours worked, particularly when overtime is performed.
- Workers should be paid on time and on a regular basis, preferably directly to their bank account.
- Allowances deducted from salary should be justified, reasonable and clearly explained to workers.

8.4 Hiring Underage Workers

- TSL has a policy regarding the minimum age for employment that complies with national laws but is no less than 15 years of age.
- TSL does not hire any children younger than 15. Similarly, the Company does not hire any children who have not reached the age when compulsory schooling ends in their country, unless they take part in formal apprenticeship programs.
- TSL does not hire or contract any workers under the age of 18 to work in dangerous conditions, in particular underground, underwater, at dangerous heights, or in confined spaces.

8.5 Worker Representation

- TSL respect national laws on freedom of association and right to collective bargaining.
- TSL does not discriminate against workers' representatives or against workers who seek to organise.
- Where the right to freedom of association and collective bargaining is restricted under law, TSL shall facilitate the development of parallel means of workers' representation.

8.6 Discrimination

- TSL fights all forms of discrimination in hiring, in workplace relations, and in the career paths of its employees.
- TSL is committed to promote equal opportunities between women and men
- TSL strives to develop programs to promote diversity and to raise awareness about discrimination among its staff.
- Where possible, TSL aims to align the terms and conditions of work among migrant staff involved in their operations on the same worksite.
- TSL strives to implement grievance mechanisms so that workers can use them effectively to raise any work-related grievance.

8.7 Health & Safety

- TSL strive to develop health and safety policies that cover all individuals working on its project sites, irrespective of their employment status.
- TSL shall give all categories of workers regular safety training regardless of background.
- All workers should be provided with personal protection equipment (free of charge) tailored to the work assignment.
- Every employee should have access to sanitary and catering facilities (Except for at mobile worksites).
- Each work assignment should have a risk assessment process to identify and address potential dangers in the most appropriate way.
- TSL implement a robust reporting system for workplace accidents and illnesses, including subcontractor statistics, using the Group's consolidated indicators.
- TSL strive to develop a health policy addressing emerging health threats and psychosocial risks.

8.8 Worksite Security

- TSL has the duty to protect its premises and on-site workers from all kinds of malicious acts.
- TSL expects its suppliers to adhere to security rules and report any concerns to the project management team.

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- TSL shall ensure workers security during their working hours, as well as during the time they spend at their living communities when they are under the responsibility of the company.
- Employees should be aware of TSLs safety plan and procedures. Employees and parties onboarded to the plan must comply with the safety standards.
- Security arrangements should be implemented which respect human rights and fundamental freedoms.
- Whenever possible, before settling a security arrangement, TSL shall organise a risk assessment to make sure it adopts measures proportionate to the security context in which it operates.
- TSL will engage regularly with stakeholders regarding its security arrangements.
- TSL will establish a formal process to collect and address complaints related to the implementation of security measures and potential allegations of human rights abuses.

8.9 Paid Holidays & Benefits

- TSL and its suppliers must always comply with the requirements of national laws on paid holidays.
- TSL and its suppliers should ensure that, if an occupational hazard occurs, workers are covered by death/permanent disability benefit schemes in the country of operations.
- TSL should strive to develop health insurance schemes when they do not exist or are not functioning well in the country of operation.

9.0 Community

9.1 Introduction

Construction and infrastructure operation activities can impact local communities. Whilst the Client or asset owner is generally responsible for relations with the local populations affected, TSL recognises that it can enhance and support these relations through its own activities. TSL will collaborate closely with the Client to identify, avoid, and mitigate negative impacts on the environment and communities means of subsistence. These guidelines provide detailed recommendations to avoid breaching the fundamental rights of local communities and minimise the potential negative impacts that a company might face when dealing with local communities.

9.2 Community Dialogue

- TSL shall strive to develop a mapping of local stakeholders involved or affected by the project.
- Prior to the commencement of the project, the TSL should initiate a stakeholder dialogue that includes representatives of local communities affected by the project.
- For every site and long-term activity TSL shall set up an effective and easily accessible community-based grievance mechanism. TSL expects its suppliers to refer parties to this grievance mechanism.
- TSL will develop adequate plans to manage complaints arising from local communities.

9.3 Land Management

- TSL will support the client in developing and reviewing project designs that minimise physical and/or economic displacements.
- When building infrastructure, TSL and its suppliers should take into consideration and seek to minimise the adverse social and economic impacts resulting from land acquisition or restrictions to land access and use for the communities.
- When working on a project, TSL is encouraged to contribute to any grievance mechanisms in place so that local communities can raise any land-related concerns.

9.4 Socio – Environmental Management

- TSL should seek to understand the potential negative impacts of its projects on local communities as early as possible by mapping potential risks and conducting a community impact assessment.
- TSL should strive to develop an action plan that details actions to minimise, mitigate, and/or compensate for adverse social, environmental, and economic impacts, while identifying opportunities and actions to foster positive impacts of the project on the local communities.
- TSL is encouraged to assess the positive socioeconomic impacts of its activities on the area, and to adopt measures fostering such impacts (e.g., training and hiring local low-skilled workers, developing a locally rooted supply chain, etc.)

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10.0 Value Chain Practices

10.1 Introduction

The prevention of risks of breaches of human rights in the value chain requires detailed knowledge of the management practices of the contractual partners working on our projects.

This is therefore a continuous process which can only be implemented on a long-term basis. The guidelines specify an approach that aims to gradually secure our value chain.

10.2 Awareness & Management of Risks

- Raise managers' awareness of the potential human rights issues related to the activities of subcontractors and the prime contractors involved in the project.
- Identify the most critical human rights issues related to the subcontractors' and the prime contractors' activities, involved in the project.
- Introduce specific references to human rights-related issues as part of the tendering and contractual process with the subcontractors and the prime contractors.

11.0 Policy Review

- 11.1** This policy is reviewed to ensure its ongoing suitability, as and when there are key changes (e.g., in customer, legislative, operational requirements etc.) and annually as a minimum. The board of Directors endorse this policy and shall ensure that it is implemented and communicated accordingly

Approved By

Chris Reilly

Chris Reilly
Group Chief of Staff