

# Human Rights Policy

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## Purpose

The Incitec Pivot Limited (IPL) Human Rights Policy articulates the fundamental elements of the Group's approach to human rights and how the Group demonstrates its commitment to respect human rights in line with the Universal Declaration of Human Rights and other international frameworks.

This policy provides the foundation to IPL's human rights approach and applies to IPL and each subsidiary. The IPL Code of Conduct, the IPL Supplier Code of Conduct and IPL's policies on Employment; Health, Safety, Environment and Communities; Inclusion and Diversity; Anti-discrimination and Harassment; and Australian Indigenous Relations also contain human rights commitments.

## Commitment

IPL respects and supports the dignity, well-being and human rights of our employees and those in the communities in which we operate. Our approach to human rights is consistent with the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

Human rights are integrated into existing corporate processes and policies, including:

### Health and safety

IPL respects the rights of employees to a safe and healthy workplace and is committed to the goal of 'Zero Harm for Everyone, Everywhere'. We seek to manage our activities with concern for the safety of our employees, contractors, customers and all persons affected by our operations or products.

IPL has established and maintains health and safety management standards and systems in compliance with relevant industry standards and regulatory requirements and is committed to providing a safe and healthy working environment. IPL is committed to conducting our operations in accordance with all relevant licences and regulations, and strives to be a valued corporate citizen in the communities in which we operate.

## Labour relations

IPL respects the rights and dignity of employees throughout its operations and prohibits the use of child labour and forced labour, including indentured labour, bonded labour, modern forms of slavery and human trafficking. IPL is committed to providing:

- clarity with respect to performance expectations of its employees, and ensuring that employees have the necessary tools and support to deliver on these expectations, are recognised and rewarded appropriately if their objectives are achieved, and are coached or counselled where performance expectations are not met;
- appropriate management of the number of working hours in compliance with relevant industry standards and regulatory requirements, as part of our commitment to providing a safe and healthy working environment;
- compensation that, at the very least, meets the legal minimum wage;
- mandatory paid vacation; and
- good-faith relationships with elected employee representatives.

### ***Freedom of Association and Collective Bargaining***

IPL respects our employees' right to join, form or not to join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

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## Diversity and equal opportunity

IPL is committed to building an inclusive and accessible organisation through the development of a culture that embraces diversity. Embracing diversity is about recognising, respecting and valuing the unique attributes and different characteristics of each individual. These differences can include, but are not limited to, gender, ethnicity, cultural background, age, disability, sexual orientation and religious belief.

### **Discrimination and Harassment**

IPL does not tolerate inappropriate behaviour, unfair treatment or victimisation. Harassment is not tolerated in the workplace or in any work-related circumstance outside the workplace. IPL employees are required to undertake regular training in this area.

### **Communities and Indigenous peoples**

IPL respects and supports the rights of members of the communities in which we operate. We provide communities with easily accessible complaints mechanisms and we listen to and take actions to address complaints. We work to optimise the benefits and reduce the negative impacts of our activities, both for local communities and the countries in which we operate. We acknowledge and respect Indigenous peoples' connections to lands and waters, consistent with the UN Declaration on the Rights of Indigenous Peoples.

### **Third parties**

Through appropriate contractual arrangements and procurement principles, we prequalify our consultants, agents, contractors and suppliers to align our expectations regarding compliance with our human rights commitments and values. We seek to influence the joint venture partners and non-controlled companies in which we participate to also respect our commitments to uphold human rights.



**Jeanne Johns**  
Managing Director & CEO  
May 2019

## Actions to Meet our Commitment

### **Due Diligence and Audit**

IPL is committed to the use of due diligence as a means to identify and prevent human rights risks to people in our business and supply chain, and to undertaking audits as a means of checking compliance with human rights requirements.

### **Guidance and Reporting for Employees**

IPL strives to create workplaces in which open and honest communication among all employees is valued and respected. The Company is committed to comply with applicable labour and employment laws wherever we operate. Any employee who believes a conflict has arisen between the contents of this policy and the laws, customs or practices of their workplace, or would like to confidentially report a potential violation of this policy or local laws, should:

- Talk to their manager or supervisor – this is often the best person to contact first;
- Contact the Group General Counsel or Chief Risk Officer;
- Contact the IPL Whistleblower Hotline; or
- In appropriate circumstances (where a personnel matter is concerned), contact Human Resources personnel.

# Incitec Pivot Limited

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**INNOVATION ON THE GROUND**

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