

# Human Rights Policy Statement

Our commitment is to respect all human rights of workers and business associates in accordance with national laws and international human rights standards, including the Universal Declaration of Human Rights.

## Scope

ECO's human rights responsibilities begin at home with how we treat our own employees and then extend across our markets to include our clients, external partners, and community stakeholders. Our emphasis on human rights starts at the top of our organization, with Board approval or senior executive sponsorship of our policies and commitments that make up ECO's human rights program. ECO's Code of Conduct and Purchasing Procedure make clear that our commitment to human rights, and global labor standards extends to the third parties we work with, including joint venture partners, subconsultants, vendors, suppliers and other business partners.

## Objectives:

- To identify policy gaps and initiate a process that alerts the company to new areas of human rights risk.
- To provide a basis for embedding the responsibility to respect human rights through all business functions.
- To respond to relevant stakeholder concerns.
- To elaborate on the company's commitment to support human rights.
- To foster the development of in-house learning, management capacity and leadership on human rights issues.

## Principles

- **Child Labour:** Eco does not employ individuals who are under eighteen years of age. We prohibit our third parties from using child labor or being complicit in its use through their suppliers.
- **Corruption:** Recognizing that many human rights abuses are tied to corruption, ECO views its anticorruption efforts as an essential part of our human rights program.
- **Forced and Compulsory Labour:** ECO strictly prohibits forced or compulsory labor, human trafficking, or any other form of modern slavery. We are committed to international labor standards and the eradication of forced labor. We ensure that no worker is coerced to work against her/his will through the use of violence, intimidation, financial coercion or threat of penalty or sanction. We prohibit confiscation of workers' identity documents, and ensure that no recruitment fees are charged to the workers.
- **Environment, Health and Safety:** In recognition of the right to a safe and healthy working environment, ECO is committed to ensuring exceptional levels of performance in safeguarding people and the

environment. ECO's Health Safety and Environment expectations and employee obligations are set out in our Safety, Health & Environment Quality Policy.

- **Working Conditions, Working Hours and Wages:** ECO provides reasonable working conditions and hours throughout the organization. We comply with all other applicable laws related to working hours and compensation.
- **Grievances And Concerns:** We ensure our workers can express grievances and concerns without fear of reprisal. ECO has Grievance Redress Mechanism (GRM) to address all environmental and social issues, questions and grievances from the employees and stakeholders using an understandable and transparent process.

## Our Approach to Prevention

ECO's commitment to human rights is incorporated into a variety of human resources, labor and employment, ethics and compliance, quality, procurement, Safety, Health, Environment and Quality (SHEQ) and operational policies and processes that help us prevent, detect, investigate and mitigate any potential violations of fundamental human rights. Prevention starts with the adoption of these policies and processes. These are then communicated to employees through safety, code of conduct, and other compliance training that are required for all employees. Employees who violate these human rights policies are subject to disciplinary action, which may include termination of employment, but may also include opportunities for personal coaching, additional training, or other remediation.

For third parties, in addition to requiring a commitment to ECO's human rights requirements and communicating our expectations, and ongoing monitoring to ensure they share ECO's values and commitment to protecting human rights.

## Our Approach to Detection and Resolution

To detect potential human rights issues, ECO conducts regular monitoring and internal and external risk and program assessments on our human rights program to ensure it remains effective. We also provide employees and third parties with multiple avenues for reporting any type of concern and require reporting on misconduct, including potential violations of our human rights commitments.

*Eddie Luyima*

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**Managing Director**

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**Date**

