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Fair Labor Policy

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1. Fair Labor Policy Statement

We at EXEO, our legal entities EXEO SAL, EXEO OFFSHORE SAL and SAS EXEO recognise that we can play an important and positive role by taking on board fair labor practices and human rights principles and by being fully compliant with the EU labor laws.

Our Fair labor policy is based on four pillars:

- Freedom of association and the effective recognition of the right to collective bargaining.
- Elimination of all forms of forced and compulsory labor.
- Effective abolition of child labor.
- Elimination of discrimination in respect of employment and occupation.

Freedom of association and the effective recognition of the right to collective bargaining

We believe that while businesses face many uncertainties in this rapidly changing global market, establishing genuine dialogue with freely chosen workers' representatives enables both workers and employers to understand each other's problems better and find ways to resolve them. Security of representation is a foundation for building trust on both sides.

Exeo is committed to:

1. Respect the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal, in accordance with national law;
2. Put in place non-discriminatory policies and procedures with respect to trade union organization, union membership and activity in such areas as applications for employment and decisions on advancement, dismissal or transfer;
3. Provide worker representatives with appropriate facilities to assist in the development of an effective collective agreement.

Elimination of all forms of forced and compulsory labor

We recognize that forced or compulsory labor is defined as any work or service that is exacted from any person under the menace of any penalty, and for which that person has not offered himself or herself voluntarily

We understand that forced labor consists of:

Lack of consent to work (the "route into"forced labor)	Menace of a penalty (keeping someone in forced labor)
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<ul style="list-style-type: none"> • Birth/descent into “slave” or bonded status • Forced Prison Labor • Trafficked Labor • Involuntary Overtime • Physical abduction or kidnapping • Sale of person into the ownership of another • Physical confinement in the work location – in prison or in private detention • Psychological compulsion, i.e. an order to work, backed up by a credible threat of a penalty for non-compliance • Induced indebtedness (by falsification of accounts, inflated prices, reduced value of goods or services produced, excessive interest charges, etc.) • Deception or false promises about types and terms of work • Withholding and non-payment of wages • Retention of identity documents or other valuable personal possessions. 	<ul style="list-style-type: none"> • Physical violence against worker or family or close associates • Sexual violence • Imprisonment or other physical confinement • Financial penalties. • Denunciation to authorities (police, immigration, etc.) and deportation. • Exclusion from future employment. • Exclusion from community and social life. • Removal of rights or privileges • Deprivation of food, shelter or other necessities. • Shift to the worst working conditions. • Loss of social status.
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Exeo does not to use, be complicit in, or benefit from forced labor by committing to:

1. Ensure that management have a full understanding of what forced labor is;
2. Make available employment contracts to all employees stating the terms and conditions of service, the voluntary nature of employment, the freedom to leave (including the appropriate procedures) and any penalties that may be associated with a departure or cessation of work;
3. Not confiscate workers’ identity documents;
4. Prohibit business partners from charging recruitment fees to workers;
5. Write employment contracts in languages easily understood by workers, indicating the scope of and procedures for leaving the job;
6. Be aware of countries, regions, industries, sectors, or economic activities where forced labor is more likely to be a practice;
7. In planning and conducting business operations, ensure that workers in debt bondage or in other forms of forced labor are not engaged and, where found, provide for the removal of such workers from the workplace with adequate services and provision of viable alternatives;
8. If forced labor is found within the company’s sphere of influence, provide for the removal of such workers from the workplace with adequate services. To the extent possible, assist with workers’ access to viable alternatives.

Effective abolition of child labor

We at Exeo comply with the EU prescribed minimum age for admission to employment or work that must not be less than the age for completing compulsory schooling, and in any case not less than 18 years. Trainees between the age of 14 and 18 are accepted only for a training period during school holidays and of less than 50% of total school holidays.

We believe that developing an awareness and understanding of the causes and consequences of child labour is the first step to prevent this problem.

We are committed to:

1. Use adequate and verifiable mechanisms for age verification.
2. When children below the legal working age are found in the workplace, take measures to remove them from work.
3. To the extent possible, help the child removed from the workplace and his/her family to access adequate services and viable alternatives.
4. Exercise influence on subcontractors, suppliers and other business affiliates to combat child labour.

Elimination of discrimination in respect of employment and occupation

We at Exeo understand that discrimination in employment and occupation occurs when a potential candidate is treated differently or less favourably because of characteristics that are not related to his/her merit or the inherent requirements of the job. These characteristics include: race, colour, sex, religion, political opinion, national extraction or social origin, sexual orientation, age, HIV/AIDS.

We promote equality and are aware of the diversities of language, culture and family circumstances that may exist in the workforce. We seek to develop an understanding of the different types of discrimination and how it can affect the workforce.

We are committed to:

1. Institute company policies and procedures which make qualifications, skills and experience the basis for the recruitment, placement, training and advancement of staff at all levels.
2. Assign responsibility for equal employment issues at a high level, issue clear company-wide policies and procedures to guide equal employment practices, and link advancement to desired performance in this area.
3. Provide staff training on non-discrimination policies and practices, including disability awareness.
4. Reasonably adjust the physical environment to ensure health and safety for employees, customers and other visitors with disabilities.
5. Keep up-to-date records on recruitment, training and promotion that provide a transparent view of opportunities for employees and their progression within the organization.
6. Where discrimination is identified, develop grievance procedures to address complaints, handle appeals and provide recourse for employees.
7. Be aware of formal structures and informal cultural issues that can prevent employees from raising concerns and grievances.



2. Responsibilities

Exeo is represented by the Corporate Governance Committee with the general responsibility to monitor and improve the established policies and establish processes for handling deviations and exceptions. Also, the committee carefully monitors supply chains and subcontracting arrangements and exercises due diligence in dealings with other businesses to ensure Fair Labor principles are respected.

3. Review of the policies

This policy is reviewed at planned intervals or if significant changes occur to ensure its continuing suitability, adequacy and effectiveness.

The policy review takes the results of management reviews into account.