

SPECIAL LABOUR POLICY

Revision #: 3.0

Effective Date: 01/07/2025

Prepared by:

Emmanuel Tete Darko - Admin & HR Manager Approved by:

Date:

01/07/2025 Date:

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HRM-6.6.1

Willem Baert - General Manager

1.0 **Policy Statement**

Plantations SOCFINAF Ghana (PSG) Limited is committed to preventing all forms of forced labor in our company's workforce and is committed to ethical and fair employment of migrant workers and fixed term contract workers.

2.0 Objective

PSG aims to offer the greatest protection to the class of migrant workers through the adherence of set Standards established under this Policy.

3.0 Scope

The policy applies to all PSG migrant employees, fixed term contract (FTC) workers, contractors and third-party contractors (including temporary contractors) of PSG, who employ migrant workers.

4.0 **Definitions**

- Forced Labor: All work or service which is exacted from any person under 4.1 the menace of any penalty, and for which said person has not offered him or herself voluntarily.
- 4.2 Migrant workers: workers who migrate from their country of origin or permanent residence to obtain employment in the Company, located in this country.

5.0 Guidelines

PSG has devised the following measures to protect the rights of migrants and promote equality in the workplace.

- PSG will safeguard the fundamental human rights of the migrant worker to make an honest and decent living through diligence and hard work. Migrant workers shall not be subject to any discrimination in any aspect of our employment relationship.
- The confiscation or withholding of a worker's original personal identification documents including passports, visas, or immigration clearance is strictly prohibited. Identification documents can only be kept by the employer/contractor where consent has been obtained from the worker.
- Post arrival orientation will be conducted for migrant workers upon arrival on site; to focus especially on language using interpreters where necessary, health, safety, environment, labour laws, and cultural practices.
- Contracts are signed, by migrant/FTC workers and PSG, at the beginning of the recruitment process, without recruitment fees. The company will ensure



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workers are allowed to independently review the contract and, where workers are illiterate, the contract should be read out loud in full to the workers in their own language before asking them to sign. The use of supplementary agreements or practice of substituting the original contract of employment or any of its provisions with those that are less favorable to migrant workers are strictly prohibited and any contractor, where applicable, found to be engaging in such practice will face losing their contract with PSG.

- Migrant/FTC workers shall not be subject to any form of forced, compulsory, bonded, or indentured labor, physical or sexual violence, harassment and intimidation. All work must be voluntary, and workers will be free to terminate their employment at any time, without penalty. Migrant workers' family members shall not be threatened with denunciation to authorities to coerce them into taking up employment or preventing them from voluntarily terminating their employment, at any time, without penalty.
- Migrant workers shall not be held in debt bondage or forced to work in order to pay off a debt. Any advance or loans should be documented. Terms and conditions of payment would be fair and transparent.
- PSG or the contractor shall not restrict the migrant/FTC workers' access to basic facilities and accommodation. Migrant workers' freedom of movement inside the workplace shall not be restricted except for legitimate concerns for worker safety.
- PSG shall comply with the Ghana Labour Migration Policy (Validated in 2019), which seeks protection of migrant workers and ensures promotion of their welfare. PSG also subscribes to the minimum standards of the International Labour Organization (ILO) Force Labour Convention, 1930 (No 29), the international Labour Organization (ILO) Abolition of Force Labour Convention, 1957 (No.105) and united Global Compact, Principle 4 (force and compulsory Labour), 2009 which ensure that no person shall be forced to work under duress, or threat and for which the said person has not offered them voluntarily.
- Contractors involved in the recruitment of migrant workers will be contractually bound to comply with the policy.
- The Internal Grievance Management Procedure shall be followed if any migrant worker feels that any of the provisions of this policy is perceived to have been violated.
- The Human Resource Department shall manage, monitor and oversee this policy.

NB: PSG Limited, as a responsible corporate entity, does not engage persons less than 18 years, nor does it engage in trafficked labour.