



HUMAN RIGHTS POLICY

Trusted Partners is an Environmental & Social Risk Management advisory firm delivering ESG, sustainability and risk and impact management services across Africa and, where required, internationally. Respect for human rights and ethical business conduct are fundamental to **Trusted Partners**' identity, to the integrity of its advisory services, and to the manner in which it manages its own operations, relationships and professional responsibilities. **Trusted Partners** recognises that its responsibility to respect human rights applies not only within the context of its client-facing work, but equally within its own business, including the way it engages personnel, selects and manages third parties, undertakes procurement, mobilises for assignments, conducts field activities, and makes operational and commercial decisions.

This Policy sets out the commitments, minimum standards and operational expectations **Trusted Partners** applies in order to respect human rights and to prevent, identify, mitigate and address adverse human rights impacts in connection with its operations and business relationships. It establishes the framework through which **Trusted Partners** seeks to manage human rights risk in a practical, proportionate and risk-based way, while expressly retaining a zero-tolerance approach to modern slavery, human trafficking, forced labour, servitude and related forms of exploitation.

Trusted Partners recognises that modern slavery is among the most severe forms of human rights abuse and may arise in any sector or geography where vulnerable workers are exposed to coercion, deception, abuse of power, withheld wages, debt dependency, intimidation, restrictions on movement, confiscation of documents, or exploitative recruitment and employment conditions. Although **Trusted Partners** operates as a professional services firm and does not generally maintain a large direct labour force in high-risk industries, it acknowledges that material risk may still arise through its supply chain, procurement arrangements, field support services, sub-consulting relationships, subcontracting models, logistics, travel and accommodation arrangements, and project delivery in diverse jurisdictions and operating contexts.

Accordingly, **Trusted Partners** adopts a broader human rights framework within which modern slavery is treated as a salient and priority risk. **Trusted Partners** is committed to acting ethically, lawfully and with integrity in all business dealings and relationships, to embedding human rights considerations into its governance and decision-making, and to taking reasonable and proportionate measures to ensure that neither its own operations nor its business relationships are associated with exploitation, abuse or avoidable harm to people.

This Policy must be read and implemented alongside applicable laws, contractual obligations and related internal controls, including procurement procedures, finance and expense controls, recruitment and engagement arrangements, grievance processes, and other relevant management systems. Where local law, client requirements, lender standards or contractual

obligations impose a higher standard than that set out in this Policy, **Trusted Partners** and its Representatives must comply with the higher standard.

1 Policy Statement

Trusted Partners is committed to respecting internationally recognised human rights in all areas of its operations and business relationships. The Company's approach is informed by internationally recognised human rights and labour principles, including those reflected in the United Nations human rights framework, the International Labour Organization's core labour standards and principles, and relevant international good practice relating to labour and working conditions, human rights due diligence, worker welfare and responsible supply chain management. **Trusted Partners** also seeks to remain aligned with applicable legal and policy requirements relevant to human rights, labour rights, anti-trafficking, modern slavery and responsible business conduct in the jurisdictions in which it operates or with which it is connected, including relevant frameworks in the United Kingdom, the European Union and South Africa.

Trusted Partners takes a zero-tolerance approach to modern slavery in all its forms. Modern slavery is a crime, a grave abuse of human dignity, and a serious violation of fundamental rights. It includes, without limitation, slavery, servitude, forced or compulsory labour, debt bondage, trafficking in persons, deceptive or coercive recruitment, and other practices through which a person's liberty is constrained or exploited for personal or commercial gain. **Trusted Partners** strictly prohibits such conduct and will not knowingly engage in, benefit from, facilitate, conceal or tolerate it within its operations or through its business relationships.

Trusted Partners is committed to conducting business in a manner that respects the dignity, equality, wellbeing and safety of all persons who may be affected by its activities. This includes a commitment to lawful and fair labour practices, non-discrimination, protection from harassment and abuse, responsible contracting and procurement, risk-based due diligence, responsible reporting and escalation, and support for appropriate remedy where harm has occurred. The Company further recognises that respect for human rights requires more than passive compliance. It requires active attention to risk, sound judgement in commercial and operational decisions, and the willingness to respond responsibly where concerns or impacts are identified.

Trusted Partners expects all persons working for or on behalf of the Company, and all relevant third parties with whom it conducts business, to act consistently with the intent and requirements of this Policy.

2 Who is covered by this Policy

This Policy applies to all Partners, Associate Partners, employees, secondees, associates, sub-consultants and sub-contractors of **Trusted Partners** (together, "Representatives"), irrespective of engagement type, seniority, location or working arrangement. The requirements of this Policy apply at all times and across all activities undertaken for or on behalf of **Trusted Partners**, including business development and client engagement, tendering and procurement processes, contracting and project delivery, fieldwork and travel, invoicing and financial transactions (including expense claims and payments), and all dealings with government or public officials, regulators and other authorities.

For the purposes of this Policy, a "third party" means any individual or organisation with whom **Trusted Partners**, or any Representative acting on its behalf, interacts in the course of **Trusted Partners'** work. This includes, without limitation, clients, customers, suppliers, service providers,

agents, intermediaries, contractors, sub-contractors, joint venture and consortium partners, public authorities, and community or stakeholder representatives.

Where a business location, project context, client requirement or legal framework requires more than what is stated in this Policy, Representatives must comply with the higher standard. This Policy functions as a minimum baseline and must be implemented together with applicable legal requirements and contractual obligations.

This Policy does not form part of any employee's contract of employment and may be amended by **Trusted Partners** at any time.

3 Our Human Rights Commitments

Trusted Partners is committed to respecting the human rights of all individuals who may be affected by its operations or business relationships. In practical terms, this means that the Company expects all work linked to its business to be undertaken in a manner that is lawful, ethical and respectful of human dignity. **Trusted Partners** seeks to ensure that people are not subjected to exploitation, coercion, abuse, discrimination, intimidation or unsafe and degrading conditions in connection with its activities.

Trusted Partners is committed to the following core principles:

- All persons must be treated with dignity, fairness and respect;
- Employment and labour practices must be lawful, transparent and non-exploitative;
- No person shall be subjected to forced labour, debt bondage, servitude, trafficking or any other form of modern slavery;
- Child labour shall not be tolerated, and young workers shall be protected in accordance with applicable law and good international practice;
- Discrimination, harassment, intimidation and abuse are prohibited;
- Lawful wages, working hours, leave and employment terms must be respected;
- Workers must not be subject to arbitrary restrictions on movement, unlawful retention of identity documents, coercive recruitment practices or exploitative deductions;
- Workers and affected persons must be able to raise concerns without fear of retaliation;
- Health, safety and wellbeing must be given due weight in operational and management decisions; and
- Human rights risks and impacts must be identified and managed through proportionate due diligence and responsible decision-making.

Trusted Partners further recognises that individuals and groups may experience heightened vulnerability to abuse or exclusion depending on their circumstances. Such groups may include migrant workers, contract workers, temporary workers, agency workers, women, young workers, persons with disabilities, workers in remote settings, individuals recruited through labour brokers or informal channels, and persons who may be economically, socially or legally vulnerable. **Trusted Partners** expects its Representatives to remain alert to such vulnerabilities and to exercise heightened care where risk factors are present.

3.1 Modern Slavery as a Salient Human Rights Risk

Trusted Partners recognises modern slavery as one of its salient human rights risks. Modern slavery is understood broadly to include slavery, servitude, forced or compulsory labour, debt bondage, trafficking in persons and analogous practices involving the deprivation of liberty or the use of coercion, deception, abuse of power or vulnerability for the purpose of exploitation.

The Company acknowledges that, as a professional services business, its direct labour footprint may be comparatively limited when measured against labour-intensive industries such as agriculture, manufacturing, construction or extractives. However, this does not eliminate exposure to severe labour exploitation risks. Modern slavery risk may still arise through the Company's procurement of services, engagement of sub-consultants and contractors, use of transport and logistics providers, accommodation arrangements, outsourced administrative services, fieldwork support, security services, cleaning and catering providers, and through work undertaken in unfamiliar, remote or weakly regulated operating environments.

Risk may be elevated where service providers rely on informal labour arrangements, labour brokers, migrant workers, temporary workers, complex or layered subcontracting structures, or cross-border recruitment channels. Risk may also arise where commercial pressures, compressed delivery timelines, unrealistic pricing, low visibility over workforce conditions, or weak oversight create incentives for exploitative labour practices. **Trusted Partners** therefore requires its Representatives to approach such situations with caution, sound judgement and a conservative risk mindset.

Trusted Partners strictly prohibits all forms of modern slavery and will not knowingly engage with, benefit from, facilitate, conceal or tolerate such practices within its own operations or in connection with its business relationships.

3.2 Labour Rights and Fair Working Conditions

Trusted Partners is committed to fair, lawful and decent working conditions within its own operations and expects the same standard from those with whom it does business. The Company recognises that labour rights are a core component of human rights and that dignified work is central to preventing exploitation and abuse.

Accordingly, **Trusted Partners** supports and expects:

- Clear and lawful terms and conditions of employment or engagement;
- Fair recruitment and onboarding practices;
- Payment of wages and benefits in a lawful, transparent and timely manner;
- Lawful working hours, rest breaks and leave arrangements;
- Fair and respectful disciplinary processes;
- Equal opportunity and non-discrimination in recruitment, promotion, remuneration and treatment;
- Protection from harassment, bullying, abuse and intimidation;
- A work environment that does not rely on coercion, threats, violence or degrading treatment;
- Respect for lawful rights relating to freedom of association and collective worker representation;
- Effective occupational health and safety management proportionate to the nature of the work; and
- Access to channels through which concerns may be raised safely and responsibly.

Trusted Partners further expects that no worker connected to its operations or business relationships shall be required to surrender passports, identity documents or work permits as a condition of employment, nor be compelled to pay recruitment fees or incur debt in order to secure work. The Company regards such practices as serious warning signs of forced labour risk and requires their prompt escalation and review.

3.3 Human Rights Due Diligence

Trusted Partners is committed to implementing human rights due diligence as an ongoing, risk-based process integrated into the way the Company plans, procures, contracts, mobilises and manages its activities. The purpose of due diligence is not merely to identify legal non-compliance after the fact, but to anticipate and reduce the likelihood of harm, respond appropriately to risks and impacts that do arise, and strengthen systems and controls over time.

The level and depth of due diligence applied by **Trusted Partners** will be proportionate to the nature of the service, the context in which work is undertaken, the type of third party involved, the visibility of labour practices, and any indicators of heightened vulnerability or exploitation risk. Due diligence may therefore range from baseline screening and contractual controls for lower-risk engagements to more detailed inquiries, enhanced scrutiny, corrective action requirements and ongoing monitoring where the risk profile is elevated.

In practice, **Trusted Partners** may consider, among other things:

- The nature of the services being procured or delivered;
- The geographic and legal context in which the work is performed;
- The extent to which labour is outsourced, informal or difficult to oversee;
- Whether subcontracting is involved and, if so, how deeply layered it is;
- Whether workers may be migrants, temporary workers, agency workers or recruited through third parties;
- Whether pricing, timing or commercial arrangements appear inconsistent with lawful and ethical labour standards;
- Whether a supplier or service provider is willing and able to provide reasonable information about its workforce, labour practices and subcontracting arrangements; and
- Whether there are indicators of past or present concerns relating to exploitation, labour abuse, trafficking, discrimination or unsafe working conditions.

Trusted Partners expects due diligence to be a living process. Representatives must remain alert not only at onboarding stage, but throughout the life of an engagement. A change in delivery arrangements, location, subcontracting patterns, workforce composition or field conditions may materially alter the human rights risk profile and may require additional scrutiny or controls.

3.4 Supplier, Contractor and Business Partner Expectations

Trusted Partners expects all suppliers, service providers, contractors, sub-contractors, sub-consultants and other business partners to operate in a manner consistent with the principles and expectations set out in this Policy. The Company recognises that respect for human rights must extend beyond its own direct operations and that business relationships can create, contribute to or be directly linked to adverse impacts on workers and other affected persons.

Accordingly, **Trusted Partners** expects third parties to:

- Comply with all applicable labour, employment, anti-trafficking and human rights-related legal requirements;
- Prohibit forced labour, trafficking, servitude, debt bondage and child labour;
- Maintain fair and lawful employment practices;
- Avoid recruitment practices that involve deception, coercion, recruitment fees or debt-based dependency;
- Respect worker freedom of movement and possession of identity documents;

- Provide working conditions consistent with applicable law and reasonable standards of dignity and safety;
- Avoid abusive, degrading or discriminatory treatment;
- Disclose material subcontracting arrangements and manage risks arising from such arrangements;
- Cooperate with proportionate due diligence, information requests and corrective action processes; and
- Take timely and effective action where concerns or gaps are identified.

Where appropriate, **Trusted Partners** will incorporate relevant expectations into procurement procedures, supplier onboarding processes, contractual clauses, codes of conduct, declarations, scopes of work and ongoing supplier management activities. The Company may require suppliers or partners to provide information, confirmations or documentary evidence sufficient to enable a reasonable assessment of labour and human rights risk.

Where a third party is unwilling or unable to provide reasonable assurance in relation to labour and human rights practices, or where serious risks or impacts are identified and cannot be mitigated to an acceptable level, **Trusted Partners** may decline to enter into the relationship, may suspend the engagement, or may terminate it, taking into account the severity of the issue, the possibility of meaningful corrective action and the need to avoid creating further harm through disengagement.

3.5 Identification of Red Flags and Escalation Expectations

Representatives must remain alert to indicators that human rights abuse or modern slavery risk may be present in connection with **Trusted Partners**' business. Warning signs may arise directly through observation or discussion, or indirectly through commercial, administrative or operational anomalies.

Examples of indicators that may require further inquiry or escalation include:

- Workers appearing fearful, intimidated, controlled or unable to speak freely;
- Withholding of wages, persistent underpayment or unexplained deductions;
- Workers lacking possession of their own passports or identity documents;
- Evidence of debt-related dependency, recruitment fees or deceptive recruitment terms; Excessive working hours without lawful rest;
- Poor or degrading accommodation or welfare conditions where linked to the work;
- Unclear employment status or inability to explain basic employment arrangements;
- A supplier's reluctance to discuss labour practices or subcontracting structures;
- Pricing or delivery commitments that appear unrealistically low or compressed; and
- Repeated inconsistencies in workforce, payment or mobilisation arrangements.

Representatives are expected to treat such indicators seriously and to escalate concerns promptly. **Trusted Partners** does not expect Representatives to make definitive legal determinations before reporting a concern. Rather, the Company expects early escalation where circumstances suggest uncertainty, discomfort, inconsistency or potential harm.

3.6 Reporting, Grievance and Access to Remedy

Trusted Partners encourages a culture in which concerns relating to human rights, labour conditions, modern slavery or other unethical conduct can be raised openly, responsibly and at an early stage. The Company recognises that human rights harms are often difficult to identify

and that affected persons may be reluctant or unable to report concerns due to fear, dependency, vulnerability, language barriers, power imbalances or lack of trust.

To support responsible reporting, **Trusted Partners** maintains and supports channels through which concerns may be raised by Representatives and, where applicable, by external parties including workers engaged by third parties, suppliers, contractors, community members and other stakeholders. Reports may be made confidentially and will be treated seriously and in good faith.

Concerns may include, without limitation, suspected modern slavery, trafficking, forced labour, exploitative recruitment, wage abuse, coercion, intimidation, discrimination, unsafe working conditions, harassment, restrictions on movement, unlawful retention of documents, abusive accommodation arrangements, retaliation, or other actual or potential adverse human rights impacts.

When concerns are raised, **Trusted Partners** will assess them in a manner that is proportionate to the nature and severity of the issue. The Company will seek to respond in a manner that prioritises the safety, dignity, privacy and wellbeing of affected persons and that avoids actions likely to increase risk or expose individuals to reprisal. Responses may include fact-finding, internal review, engagement with the relevant business partner, enhanced due diligence, corrective action requirements, changes to contractual arrangements, referral to appropriate authorities or support mechanisms, and, where necessary, suspension or termination of an engagement.

Trusted Partners recognises the importance of remedy where harm has occurred. Where the Company identifies that it has caused or contributed to an adverse human rights impact, it will seek to provide for or cooperate in appropriate corrective and remedial action. Where impacts are directly linked to the Company's services or business relationships, **Trusted Partners** will use its leverage, to the extent reasonably possible, to encourage prevention, mitigation and appropriate response.

The Company also recognises that its internal grievance arrangements do not replace or restrict access to legitimate judicial, regulatory, administrative, worker representation or other external mechanisms.

3.7 Protection from Retaliation

Trusted Partners is committed to ensuring that no person suffers retaliation for raising a genuine concern, seeking advice, participating in an inquiry, supporting an affected individual, or refusing to participate in conduct that would breach this Policy or applicable law.

Retaliation in any form is prohibited. This includes dismissal, threats, intimidation, discrimination, victimisation, harassment, exclusion, disadvantage, damage to reputation, loss of opportunity, or any other unfavourable treatment connected to the raising of a concern in good faith.

Any person who believes they have been subjected to retaliation, or who becomes aware of retaliation against another person, must report the matter promptly. **Trusted Partners** will treat such allegations seriously and will investigate and address them as a priority.

4 Accountability

It is a condition of appointment and/or engagement that all Representatives understand and adhere to this Policy. While the **Partners** retain overall accountability for policy governance, every Representative has a personal responsibility to act with integrity and to ensure that **Trusted Partners'** business is conducted in a manner that does not create, enable, conceal, or normalise modern slavery risk.

In practice, Representatives are accountable for:

- Applying prudent judgement in the selection and management of third parties, particularly where services involve labour-intensive activities, subcontracting chains, or higher-risk jurisdictions;
- Avoiding behaviours or decisions that may inadvertently incentivise exploitative practices, including accepting pricing or delivery commitments that appear inconsistent with lawful and ethical labour standards;
- Recognising potential indicators of coercion or exploitation and treating such indicators seriously, even where they may appear indirect or inconvenient to delivery timelines;
- Escalating concerns promptly to the **Partners** so that the Company can respond appropriately and consistently; and
- Cooperating in good faith with internal reviews, enquiries, investigations, or corrective and preventative measures.

Trusted Partners encourages responsible reporting and will treat disclosures seriously, in good faith and without retaliation. Failure to comply with this Policy, or failure to escalate known or reasonably suspected risks, may result in disciplinary action or termination of engagement, consistent with contractual terms and applicable law.

5 Training and communication

Trusted Partners will provide proportionate training, communication and practical guidance to support understanding and implementation of this Policy. The Company recognises that policy commitments are only effective where individuals understand what is expected of them and how those expectations should be applied in day-to-day decisions.

Awareness activities may include induction briefings, periodic policy communications, management discussions, procurement guidance, fieldwork preparation, and targeted training for those whose roles involve higher exposure to supplier engagement, contracting, mobilisation, logistics or work in elevated-risk environments.

Trusted Partners will also communicate relevant aspects of this Policy to third parties where appropriate, particularly in connection with procurement, contracting, project mobilisation and higher-risk engagements.

6 Responsibility for the Policy

The **Partners** have overall accountability for ensuring that this Policy is effectively implemented, remains fit-for-purpose, and continues to meet **Trusted Partners'** legal, ethical and professional obligations across the jurisdictions in which the Company operates.

In addition, the **Partners** retain day-to-day responsibility for the governance and operation of this Policy, including providing authoritative interpretation and guidance, monitoring compliance and the adequacy of controls, receiving and responding to concerns and incidents, and driving

corrective and preventative improvements where gaps, weaknesses or recurring risks are identified.

7 Risk assessment, monitoring and review

Trusted Partners treats human rights and modern slavery risk as part of its broader governance and risk management framework. The Company will periodically review the adequacy of this Policy and the effectiveness of its implementation in light of the nature of its operations, its service lines, the jurisdictions in which it works, its supply chain profile, evolving legal requirements, client expectations, and lessons arising from grievances, incidents, reviews or near misses.

Monitoring may include review of due diligence records, supplier screening outcomes, contractual controls, grievances raised, incidents reported, corrective actions, and observations arising from project work or procurement activities. **Trusted Partners** will use this information to identify weaknesses, strengthen controls, improve awareness, and refine its approach over time.

This Policy does not form part of any contract of employment and may be amended by **Trusted Partners** at any time. It shall be reviewed at least annually, and additionally where material changes occur to the Company's operations, service profile, risk exposure, legal obligations or stakeholder expectations.

8 Policy review and effective date

This Policy is reviewed at least annually and additionally when material changes occur to **Trusted Partners'** operations, service lines, client requirements or applicable legal obligations. The most recent version remains in effect until formally updated and re-issued.

9 Contact

Questions regarding this Policy or concerns relating to human rights should be directed to the **Partners** through **Trusted Partners'** official communication channels.

DATE OF APPLICABILITY		NEXT REVIEW	
March 01, 2026		February 28, 2028	
NAME	POSITION	DATE	SIGNATURE
Malcolme Logie	Partner	March 01, 2026	<i>Malcolme Logie</i>
Nishal Sewruttan	Partner	March 01, 2026	<i>Nishal Sewruttan</i>