JEN-ESG-001 Human Rights Policy

Policy Summary

Jenner Engineering Mackay recognises that respect for human rights is a foundational duty of responsible business. We commit to aligning our operations, workforce, and supply chains with universally recognised human rights standards, eliminating discrimination (including on the basis of sex), protecting children, preventing forced labour, modern slavery, human trafficking, and upholding rights to privacy, health, dignity, and environmental protection.

This policy must be read in conjunction with:

- **JEN-HR-002 Equal Employment Opportunity Policy**
- **JEN-HR-003 Anti-Discrimination Policy**
- **JEN-MLP-001 Modern Slavery & Workforce Policy**
- **JEN-WHS-001 Workplace Health & Safety Policy**
- **JEN-ESG-003 Environmental Impact Reduction Policy**

This policy applies to all employees, contractors, suppliers, subcontractors, and business partners.

Signed:

Colin Norris – Managing Director & Head of Operations

Carol-Anne Norris – Director of Growth & Compliance

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JENNER Engineering

Innovating with Precision

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Solving Metal Problems

Building a Circular Future

Detailed Policy

Purpose & Scope

- This policy provides a comprehensive human rights framework across all business activities and value chains, supplementing and overarching existing policies (anti-slavery, EEO, WHS, environment).
- It ensures alignment with:
  - Universal Declaration of Human Rights (UDHR);
  - International Covenant on Civil and Political Rights;
  - International Covenant on Economic, Social and Cultural Rights;
  - Core Labour Standards of the ILO (freedom of association, elimination of forced/child labour, non-discrimination) via the ILO's Core Conventions;
  - OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;
  - UN Guiding Principles on Business and Human Rights (Protect-Respect-Remedy framework) Convention on the Rights of the Child;
  - International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families;
  - UN Declaration on the Rights of Indigenous Peoples (UNDRIP);
  - UN Guiding Principles on Extreme Poverty and Human Rights.
- This policy covers: discrimination, harassment, diversity & inclusion; forced labour, modern slavery, child labour, human trafficking; health, safety & wellbeing; data protection & privacy; corruption/bribery; environmental & community impacts; rights of minorities, migrants, Indigenous people, etc.
- It also includes specific constraints on use of private security forces (ensuring control, training, oversight).
- It is to be integrated with **JEN-MLP-001** (modern slavery and workforce procedures) and **JEN-WHS-001** (health & safety) to avoid duplication or conflict.

2. Standards & Frameworks (Mapping)

- The **UNGPs** provide the operational framework: (i) state duty to protect; (ii) corporate responsibility to respect; (iii) remediation and access to remedy. Australian Human Rights Commission+2Digital Library+2

- The **OECD Guidelines** call for due diligence, stakeholder engagement, disclosure, anti-corruption, labour practices, and environmental care. CSR Education+3OECD+3bundeswirtschaftsministerium.de+3
- The ILO Core Conventions embody the core labour standards: freedom of association, elimination of forced/child labour, non-discrimination in employment.
- The relevant UN human rights treaties and declarations (e.g. CRC, migrant workers, Indigenous rights) are used as aspirational guiding instruments.

3. Human Rights Commitments & Principles

We commit to:

- **Non-discrimination & equality**: including explicit elimination of discrimination against women, and recognition of rights of minorities, refugees, asylum seekers, internally displaced persons, and persons of diverse ethnic, religious, linguistic backgrounds.
- **Freedom of association & collective bargaining**: respecting workers' right to join unions or representative bodies, negotiate terms free of retaliation.
- **Elimination of forced labour, modern slavery, human trafficking, child labour**: zero tolerance. All supply chain due diligence must guard against these.
- **Protection of children**: comply with Convention on the Rights of the Child; ensure no child labour in operations or supply chain.
- **Health, safety & decent work**: integrated with **JEN-WHS-001**, recognising that safe workplaces are a human right.
- **Right to privacy & data protection**: in line with Australian Privacy Act and internationally recognised rights.
- **Cultural, Indigenous & minority rights**: respect UNDRIP, rights of Indigenous communities, including consultation and free, prior, informed consent.
- **Rights of migrant workers**: ensure protections for migrant workers and their families, no exploitative terms of engagement.
- **Environmental & community rights**: recognise interdependence of the right to a healthy environment, indigenous land rights, and community wellbeing.
- **Prohibition on abusive private security**: Any private security deployed must be under direct oversight, properly trained in human rights, and prevented from interference due to lack of instruction or control.
- **Anti-corruption & bribery**: corruption undermines equality, rule of law, and rights; we prohibit bribery and support full transparency.
- **Consumer protection & responsibility**: respect consumers' rights to information, safety, privacy.

4. Governance & Responsibilities (Mapping)

- **Managing Director & Head of Operations**: ensures alignment with WHS, environment, safety, and directs resources for human rights compliance.
- **Director of Growth & Compliance**: approves policy, leads risk assessments, coordinates due diligence, publishes reports, ensures SprintSuite integration.
- **Managers**: enforce on-ground compliance, ensure staff and contractors know and follow procedures.
- **Procurement / Supply Chain Manager**: responsible for supplier screening, audits, contract clauses, remediation, and supply chain monitoring.
- **HR & WHS teams**: deliver training, manage grievances, escalate to senior management.
- **All employees & contractors**: bound to report concerns and comply.

5. Human Rights Due Diligence Procedure & Remediation

This is modelled on **JEN-MLP-001's due diligence procedure**, extended to full human rights scope, and integrated with **SprintSuite**:

a) Risk identification & impact assessment

- Annual assessments of actual and potential human rights impacts (slavery, child labour, discrimination, privacy, environment, etc.) across operations and supply chains, stored in SprintSuite.
- Use the same supplier risk categories (Low / Medium / High) from **JEN-MLP-001**, but extended to new risk types.
- Map likely affected parties: staff, contractors, communities, migrants, Indigenous populations, consumers.

b) Integration and mitigation

- Mitigating actions are embedded into business planning, procurement, design, and operations.
- Supplier contracts include human rights clauses, audit rights, remediation obligations.
- Oversight by compliance team, documented in SprintSuite.

c) Tracking performance & effectiveness

- Track metrics via KPI dashboards (training, grievance metrics, supplier compliance rates).
- Conduct periodic reviews and internal audits.
- Engage in dialogue with potentially affected parties as part of effectiveness monitoring.

d) Remediation & remedy (for actual negative impacts)

- When adverse impacts occur, remediation measures are implemented: restitution, compensation, reinstatement, support services, changes in practices.
- Remediation cases are recorded in SprintSuite, with status tracking, assigned responsibilities, and follow-up verification.
- This answers the question: *"Does your due diligence procedure provide for remediation in the event of actual negative effects?"* — yes, with formal documented process and monitoring in SprintSuite.

6. Grievance Mechanism & Stakeholder Engagement

We design a grievance mechanism that is transparent, accessible, rights-compatible, and involves stakeholder engagement:

- Employees, contractors, suppliers, community members, and other affected parties may submit complaints via multiple channels (online form, email, phone, in person).
- Each grievance is logged with a unique ID in SprintSuite, tracked by status (received / under investigation / resolved / closed).
- The mechanism provides for dialogue with impacted parties (including union or community representatives) during investigation and remediation.
- Appeals and escalation paths to senior management or independent review are available.
- Confidentiality and non-retaliation protections are in place.

7. Risk Analysis & Mitigation (Table)

Identified Risk / Human Rights Aspect	Risk Rating (L/M/H)	Consequence Rating (L/M/H)	Primary Affected Persons / Scope	Risk Mitigation Measures	Prioritisation Rationale
Forced labour / modern slavery in supply chain	H	H	Supply chain workers globally	Supplier audits, contract terms, high-risk supplier restrictions, remediation	High potential severity, many affected, strong company influence
Child labour	H	H	Children in supplier operations	Prohibit under-age work, supplier validation, audit & termination clauses	Irreversibility, reputational risk
Discrimination / harassment (gender, ethnicity, religion)	M	M	Employees, contractors	EEO policy, anti-discrimination training, reporting & grievance process	Moderate severity, internal control high
Gender discrimination / unequal pay	M	M	Women employees	Pay equity review, equal opportunity promotion, reporting	Reputational, legal risk under Australian law
Health & safety violations	M	H	Employees, contractors	Integration with **JEN-WHS-001**, safety training, incident reporting	High potential harm, many persons
Privacy / data breaches	M	M	Employees, customers	Privacy policy, data protection controls, training	Moderate severity, legal risk
Corruption / bribery	M	H	Communities, business partners	Anti-corruption policy, due diligence, reporting, audits	High reputational & legal consequences
Indigenous rights / land rights	M	H	Indigenous communities	Free, prior, informed consent, consultation, impact assessments	High potential harm, reputational sensitivity
Migrant worker exploitation	M	H	Migrant labourers	Ensure fair contracts, monitoring, support, oversight	Vulnerable group, reputational risk

Identified Risk / Human Rights Aspect	Risk Rating (L/M/H)	Consequence Rating (L/M/H)	Primary Affected Persons / Scope	Risk Mitigation Measures	Prioritisation Rationale
Use of abusive private security	L	H	Workers, communities	Training, oversight, rules of engagement, audit	Lower frequency but high severity potential
Environmental harm impacting rights (clean water, health)	M	M	Local communities, workers	Environmental impact assessments, pollution controls, integration with **JEN-ESG-003**	Interlinked rights, reputational risk
Consumer data misuse / product harm	L	M	Customers	Product safety compliance, data security, transparency	Lower immediate risk, moderate consequences

Prioritisation rationale: Risks rated based on number of potentially affected persons, severity/irreversibility, reputational exposure, legal exposure, company ability to influence or prevent risk, and degree of direct contribution.

8. Procedures Alignment & Documentation (SprintSuite Integration)

- All risk assessments, due diligence, mitigation plans and reviews are logged and versioned in SprintSuite.
- Supplier screening, audit results, contract clauses, and remediation records stored in the Supplier Module.
- Grievance cases, investigations, and remedial actions tracked in the Grievance & Compliance Module.
- KPI dashboards and risk registers populate from SprintSuite for management review.
- Each corrective/improvement action is assigned to owners with deadlines, and closure requires verification documentation in SprintSuite.

9. Monitoring, Review & Reporting

- Quarterly reviews of KPIs, dashboards, audit results, grievance trends.
- Annual policy review, with version control and Director sign-off, documented in SprintSuite.
- A human rights due diligence / impact disclosure (summary) is published publicly (e.g. on website), covering key risks, mitigation actions, outcomes, and improvements.
- Internal and external audits may verify compliance with this policy, **JEN-MLP-001**, WHS, HR, and ESG standards.

10. Integration with Other Policies & Mapping

- **JEN-MLP-001**: We adopt and extend its supplier risk matrix, audit and remediation procedures, but under the broader human rights scope.
- **JEN-WHS-001**: Health & safety responsibilities under this human rights policy must align seamlessly with WHS systems.
- **JEN-HR-002** & **JEN-HR-003**: Non-discrimination, EEO, harassment, diversity elements in this policy provide the high-level imperatives; the HR policies implement them operationally.
- **JEN-ESG-003**: Environmental rights obligations in this policy align with your environmental impact reduction goals.

HUMAN RIGHTS DUE DILLIGENCE FLOW CHART

STEP 1. RISK IDENTIFICATION

Annual assessment of operations and supply chain. Categorise risks as Low/Medium/High. Logged in SprintSuite Risk Register.

STEP 2. SUPPLIER & WORKFORCE SCREENING

Low risk: ABN check + Supplier Code of Conduct. Medium risk: Questionnaire + contract clause. High risk: Audit/certification required.

STEP 3. TRAINING & AWARENESS

Induction training for all staff, annual refresher sessions, and role-specific training for HR and procurement. Tracked in SprintSuite.

STEP 4 – REPORTING & INVESTIGATION

Reports may be confidential or anonymous. Logged in SprintSuite with unique case ID. Investigation conducted and corrective actions assigned.

STEP 5 – REMEDIATION & CORRECTIVE ACTIONS

Protect individuals, escalate to authorities if needed, apply corrective measures. Evidence uploaded to SprintSuite Corrective Action Register.

STEP 6 – MONITORING & REVIEW

Quarterly KPI dashboard reviews, annual management reviews, and continuous improvement actions documented in SprintSuite.