

New Britain Palm Oil Human Rights Policy

New Britain Palm Oil believes that business has a responsibility to respect, support and uphold fundamental human rights as expressed in the Universal Declaration for Human Rights and its two covenants. Our commitment extends to any human being affected by our operations, including employees, suppliers, smallholders and people in communities surrounding our operations.

Although we recognise that Human Rights are universal, inalienable, indivisible, interdependent and interrelated, the nature of our operations in plantations and industrial manufacturing has lead us to focus on three core areas:

- *Free, Prior and Informed consent.* We recognise the rights granted in the UN Declaration on the Rights of Indigenous Peoples that a community has the right to give or withhold its consent to proposed projects that may affect the lands they customarily own, occupy or otherwise use.
- *Right to Health.* We endeavour to support the safety and health of our community through:
 - Comprehensive occupational health and safety improvement plans
 - Programmes for the prevention of HIV/AIDS and support of those affected
 - A ban on sexual harassment
 - Awareness building and support for victims of domestic violence
- *Rights for workers.* Our labour standards are benchmarked against the ILO core labour standards, including:
 - All employees have the right to join and form organisations of their own choosing and to bargain collectively
 - No children below 16 working paid or unpaid on our premises. We will seek to ensure that schooling opportunities are available to children in the areas where we operate
 - No bonded or forced labour. Withholding of personal documents or other bonds is prohibited
 - Equal opportunities. Discrimination based on any grounds in recruitment, dismissal or promotion is strictly banned.

Within these areas we endeavour to ensure that we always follow best practice and that our actions do not violate any basic rights or that our activities do not indirectly lead to complicity in violations of basic human rights.



NBPOL has a policy of positive engagement. We will not refrain from operating in, or conducting business with any countries. However, we will undertake full due diligence before entering into new areas of operation. We will only operate in a manner which ensures that this policy can be fully implemented, and will abstain from any business dealings which compromises our ability to comply with this policy.

Review and engagement

To ensure that we are engaged in an ongoing review of our policies and focus areas, we undertake third party social impact assessments at least every 5 years at all of our plantation operations, as well as prior to any new developments. In addition, we have a programme of ongoing engagement in place with employees, land owners and communities nearby our operations. We benchmark our performance with international frameworks, and share best practice and challenges through engagement in local and international networks.

Responsibility and scope

The General Manager for each of our operations is responsible for adherence to this policy, supported by a dedicated sustainability team at Group and local level. All relevant staff will receive training in this policy and its implications. All our operations have a widely communicated grievance procedure and whistle blowing policy, to ensure compliance and access to redress.

This policy applies to all companies in the New Britain Palm Oil Group, as well as any joint ventures and activities in which the Group has management control.

Last reviewed June 2011.