



# ofi Fair Employment Policy

September 2023





### Version Control

Action	Date	Revision	Group
Revision	1 May 2022	Correcting for <b>ofi</b>	HR
Revision	September 2023	Revision	HR



## Contents

1.	Introduction .....	5
1.1	Scope .....	5
1.2	Our Goal.....	5
1.3	Implementation.....	6
1.4	Definitions.....	6
2.	Fair Employment Standard I: Prohibition of Child Labor and Forced Labor .....	8
2.1.	Standard Requirements .....	8
2.2.	Monitoring and Recordkeeping.....	8
3.	Fair Employment Standard II: Workplace Conditions.....	9
3.1.	Standard Requirements .....	9
3.2.	Monitoring and Recordkeeping.....	10
4.	Fair Employment Standard III: Wages and Benefits .....	11
4.1.	Standard Requirements .....	11
4.2.	Monitoring and Recordkeeping.....	12
5.	Fair Employment Standard IV: Diversity & Inclusion .....	12
5.1.	Standard Requirements .....	12
5.2.	Monitoring and Recordkeeping.....	12
6	Fair Employment Standard V: Freedom of Association and Right to Collective Bargaining	13
6.1.	Standard Requirements .....	13
6.2.	Monitoring and Recordkeeping.....	13
	Annex 1: Standard Maturity Levels.....	14
	Fair Employment Standard I: Prohibition of Child Labor and Forced Labor .....	14
1.1	Level 1 .....	14
1.2	Level 2.....	14
1.3	Level 3.....	14
	Fair Employment Standard II: Workplace Conditions .....	14
2.1	Level 1 .....	14
2.2	Level 2.....	14
2.3	Level 3.....	15
	Fair Employment Standard III: Wages and Benefits .....	15
3.1	Level 1 .....	15
3.2	Level 2.....	15
3.3	Level 3.....	15
	Fair Employment Standard IV: Diversity & Inclusion .....	15
4.1	Level 1 .....	15



4.2	Level 2 .....	15
4.3	Level 3 .....	16
Fair Employment Standard V: Freedom of Association and Right to Collective Bargaining .....		16
5.1	Level 1 .....	16
5.2	Level 2 .....	16
5.3	Level 3 .....	16



## 1. Introduction

**ofi** Group PLC and its subsidiaries (“**ofi**”) is committed to providing a workplace where the rights of all our employees are respected. This policy aims to ensure our approach on fair employment is in full compliance with the conventions of the International Labor Organization (“**ILO**”) and the United Nations Global Compact’s (“**UNGC**”) guiding principles on human rights and labor.

**ofi** is committed to ensure that its employment practices secure equality of opportunity and that no prospective or existing employee receives less favorable treatment as a result of their age, gender, marital status, ethnic origin, religion, sexual orientation, family responsibilities, disability, or for any other reason which cannot be shown to be justified.

### 1.1 Scope

This policy sets out five Employment Standards which **ofi** adheres to, this cover:

- Employment Standard I – Prohibition of Child Labor and Forced Labor
- Employment Standard II – Workplace Conditions
- Employment Standard III – Wages and Benefits
- Employment Standard IV – Diversity and Inclusion
- Employment Standard V – Freedom of Association and Right to Collective Bargaining

This Policy is applicable to **ofi** and its affiliated entities, potential candidates and all Employees, i.e., full-time, part-time, temporary, interns and contract employees of **ofi** as well as Directors of the company, collectively referred to as the “Employee”.

### 1.2 Our Goal

- To treat all our employees with dignity and fairness.
- To take a proactive approach to protecting the rights of all our employees.
- To identify living wage gaps in our own operations and to commit to implementing practical solutions to start closing living wage gaps.
- To manage reorganizations responsibly.

To achieve this goal, we will:

- Ensure compliance with all applicable laws and international standards.
- Maintain a fair and non-discriminatory workplace that provides equal opportunity to everyone.
- Establish, maintain, and improve the worker-management relationship and ensure employees’ rights to self-representation.
- Take steps to protect workers, including vulnerable categories such as migrant workers, and workers engaged through third parties.
- Prohibit the use of child labor and forced labor.
- Provide safe and healthy working conditions and promote the health of workers.



### 1.3 Implementation

For the management and implementation of this and all policies, we will:

- Require all levels of **ofi** management to be accountable for applying this policy in their business decisions.
- Ensure all managers, supervisors, employees, and contractors understand this policy and their own responsibilities and accountabilities and receive appropriate training and support for success.
- Establish strategies and management systems to create and prioritize measurable objectives and execute improvement plans that address our significant risks, impacts and opportunities.
- Communicate and publicly report meaningful and accurate information regarding our performance to demonstrate continual progress towards commitments made in our policies.
- Regularly review and update this policy from time to time, as necessary.

This policy may be amended from time to time without notice.

### 1.4 Definitions

“**Apprenticeship**” means the part-time employment of an individual who is simultaneously studying for a related formal qualification at an educational institution.

“**Child**” means any person under 15 years of age, unless the legal minimum working age is higher by law, in which case such higher age applies in that jurisdiction.

“**Child Labor**” means the employment of, or work performed by, a Child.

“**Collective Bargaining**” means the negotiation of wages and other conditions of employment by an organized body of employees.

“**Contractor**” means any (i) individual worker; or (ii) business which provides workers, in each case engaged by **ofi** to provide labor services to **ofi**.

“**Diversity**” means recognition of a range of human differences, including but not limited to race, ethnicity, country of origin, gender/gender identification, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other ideologies.

“**Equal Remuneration**” means equal remuneration for men and women workers for work of equal value, including all additional income, including overtime payments.

“**Freedom of Association**” means the right of all employees to join, an association representing their collective interests.

“**Forced Labor**” means any work or service which is exacted from any person which is not offered voluntarily, including:

- (i) prison labor;
- (ii) indentured labor;
- (iii) bonded labor;
- (iv) labor facilitated by Human Trafficking;
- (v) labor in relation to which an individual's wages, identification papers, tickets etc. are unlawfully withheld;
- (vi) labor in relation to which employment fees or employment deposits are imposed;



- (vii) labor in relation to which employees are required to bear employment-related costs without reimbursement (such as work-related travel, excluding commuting); and
- (viii) labor in relation to which involuntary overtime is imposed.

For the avoidance of doubt, providing wages or other compensation to a worker for such a service does not on its own lead to such labor being Forced Labor.

**“Harassment”** means unwanted and unreasonable behavior towards an individual, which violates the individual's dignity, or which creates an intimidating, hostile, degrading, humiliating or offensive environment. This may include, but is not limited to, repeated unwanted contact without a reasonable purpose, insults, threats, touching, or offensive language and may be characterized by, but is not limited to, verbal, physical or psychological behavior that is threatening, abusive, exploitative or sexually coercive.

**“Human Rights”** means Human Rights are the basic rights and freedoms that belong to every person in the world and are described in the Universal Declaration of Human Rights. They are based on important principles like dignity, fairness, respect and equality. They are universal and inalienable and apply to everyone in equal and non-discriminatory manner.

**“Human trafficking”** means the recruitment, transfer, harboring or receipt of persons, by means of the use of threat, force, deception or other forms of coercion, for the purpose of exploitation.

**“Inclusion”** means the focusing on the needs of every individual and ensuring the right conditions are in place for each person to thrive at work.

**“Industry Wage”** means the standard wages prevalent in any given sector or industry in a given region for the particular work performed.

**“Minimum Wage”** means the minimum remuneration that employers must legally pay each worker, in any given jurisdiction, in relation to worked performed during regular working hours.

**“Subcontractor”** means any: (i) individual worker or (ii) business which provides workers, in each case engaged by a Contractor to provide labor services to **ofi**.

**“Traineeship”** means the employment of an individual who is being trained for a role.

**“Working Environment”** means the physical infrastructure and environment in which work is carried out, including but not limited to:

- (i) working conditions;
- (ii) emergency medical care; and
- (iii) a workplace free of abuse (including physical, sexual, psychological, or verbal harassment or abuse, either in person or through electronic media like mail, online forums, or social media).

**“Young Worker”** means any worker under the age of 18 but over the age of a Child.



## 2. Fair Employment Standard I: Prohibition of Child Labor and Forced Labor

### 2.1. Standard Requirements

- a. **ofi** does not permit the use of Child labor or Forced Labor, either directly by **ofi** or by **ofi**'s Contractors or Subcontractors.
- b. **ofi** does not permit Young Workers being exposed to hazardous work, either directly by **ofi** or by **ofi**'s Contractors or Subcontractors and ensures compliance with local safety requirements.
- c. Under no circumstances shall **ofi** or any Contractor or Subcontractor employ a Child unless permitted by law.
- d. No Young Worker who is an **ofi** Employee, or provided by a Contractor or Subcontractor, shall carry out any work where the work, by its nature or by virtue of the circumstances in which it is carried out, entails risk of jeopardizing the health and safety of the employee.
- e. **ofi** does not permit physical punishment, abuse, or Forced Labor of any **ofi** employee, Contractor or Subcontractor. **ofi** employees must enter into employment of their own free will and shall be allowed to leave the services of the company of their own free will.
- f. All **ofi** Contractor businesses shall maintain a roster of verified workers and only such workers shall be permitted access to **ofi** premises for rendering any work. Information maintained by Contractor businesses in relation to verified workers must contain:
  - i. Proof of age;
  - ii. Work authorization, where applicable; and
  - iii. Registration details with the applicable legal authorities.
- g. **ofi** shall not employ any Child on an Apprenticeship or Traineeship scheme.
- h. No individual employed on an Apprenticeship or Traineeship scheme shall be required by **ofi** to:
  - i. Undertake night work;
  - ii. Work more than 8 hours per day;
  - iii. Undertake work unsupervised; or
  - iv. Undertake work unrelated to the training and development relating to their Apprenticeship or Traineeship scheme.

### 2.2. Monitoring and Recordkeeping

- a. **ofi** shall maintain records of operations considered to have significant risk for incidents of:
  - i. Child Labor; or
  - ii. Young Workers being exposed to hazardous work.
- b. **ofi** shall maintain records of the measures it has taken to contribute to the effective abolition of Child Labor.
- c. **ofi** shall maintain records of operations and suppliers considered to have a significant risk of incidents of Forced Labor.





- d. **ofi** shall maintain records of the measures it has taken towards the elimination of all forms of Forced Labor.

### 3. Fair Employment Standard II: Workplace Conditions

#### 3.1. Standard Requirements

- a. **ofi** is committed to treating all its Employees, Contractors and Subcontractors with dignity, fairness and respect; and our Employee and employment related practices shall be guided by our **ofi** Code of Conduct and any local Employee Handbook, policies and national/local employment laws.
- b. **ofi** is committed to providing a safe Working Environment to all of its employees, with documented health & safety measures and standard operating processes, with a view to preventing occupational injuries or sicknesses, including physical and mental health and safety; additionally, parents, including pregnant or lactating mothers and adoptive parents are not obliged to perform work that has been determined to be potentially harmful to their health or that of their child.
- c. In the event of an emergency, all **ofi** Employees have the right to remove themselves from imminent serious danger without seeking permission from **ofi**.
- d. **ofi** shall provide hygienic and safe accommodation for Employees, where applicable.
- e. **ofi** shall provide each Employee with any necessary personal protective equipment free of charge.
- f. All **ofi** Employees should receive training on workplace safety, as defined under the Standard "Safe System of Work" under **ofi**'s Health and Safety Policy and applicable local safety regulations.
- g. **ofi** shall comply with applicable laws relating to maximum number of working days, standard working hours, and overtime hours and **ofi** shall ensure that, unless law provides otherwise, each employee's regular working hours shall not exceed 48 hours per week, excluding overtime. Other than in exceptional circumstances, and unless law provides otherwise, the sum of regular and overtime hours in a week shall not exceed 60 hours per employee.
- h. No **ofi** Employee shall be obliged to undertake overtime. In all circumstances, overtime shall be voluntary, and unless local law provides otherwise, shall not exceed 12 hours per week and shall not be requested of an employee on a regular basis.
- i. All **ofi** Employees shall be entitled to breaks as required by applicable law or **ofi** policy (whichever is more favorable to the employee), this may be set out in local Policies or Handbooks, and **ofi** shall provide employees with at least 24 consecutive hours of rest in every seven-day period, unless local law provides otherwise.
- j. All **ofi** Employees shall be entitled to at least the local legal minimum amount of annual leave.
- k. All **ofi** Employees shall have access to a Speak Out mechanism, where they may raise their grievances or whistle blow on any wrongdoing. This is set out in the **ofi** Whistleblowing Policy. The mechanism shall:



- i Clearly specify the responsible authority, escalation mechanism and process for resolving issues raised, to ensure a fair, transparent, and unbiased mechanism for resolving issues reported.
- ii Contain provision for keeping the name of the complainant confidential.
- iii Not permit any discrimination or punitive action against any Employee, who raises a grievance or complaint in good faith in accordance with international or local legal requirements or the **ofi** Whistleblowing Policy.
- iv Be clearly communicated to all Employees.

### 3.2. Monitoring and Recordkeeping

- a. Human Rights
  - i. **ofi** shall maintain records of the total number and percentage of its employees that have been subject to human rights breaches, including instances of bullying and harassment including sexual harassment, by location.
- b. Employee Health and Safety
  - i. **ofi** shall maintain records of the details of all safety related incidents as described under **ofi**'s Health and Safety Policy.
  - ii. **ofi** shall regularly assess the health and safety risks at each workplace.
  - iii. **ofi** shall assess all workplace risks to new, expectant and nursing mothers, at each workplace.
- c. Employee Grievances

**ofi** shall maintain records of the details of all grievances received by its employees during each reporting period, including those made anonymously, and including the details of any resulting investigation, report and any action taken. This should include complaints of bullying and harassment including sexual harassment as raised through procedure defined in **ofi**'s Harassment Policy.
- d. Employee Records
  - i. **ofi** shall maintain records of:
    - ~ The total number and rate of new employee hires during the reporting period, by age group, gender, and location.
    - ~ The total number and rate of employee turnover during the reporting period, by age group, gender, location,
- e. Training and Education
  - i. **ofi** shall maintain records of the total number of hours in the reporting period devoted to training on fair employment policies or procedures concerning aspects of human rights that are relevant to operations.
  - ii. **ofi** shall maintain records of the percentage of employees trained during the reporting period in human rights policies or procedures concerning aspects of human rights that are relevant to operations.

- iii. **ofi** shall maintain records of the percentage of managers/team leaders trained during the reporting period in applicable local employment laws and associated ILO conventions.
- iv. **ofi** shall maintain records of the average hours of training that **ofi**'s employees have undertaken during the reporting period, by:
  - ~ Gender;
  - ~ Location; and
  - ~ Employee category i.e., permanent, contractor, etc.
- v. **ofi** shall maintain records of the type and scope of training and education programs it has implemented, and the assistance it has provided to upgrade employee skills.

**ofi** shall maintain records of the percentage of its total employees, by gender, location and by Employee category, who received a regular performance and career development review during the reporting period.

## 4. Fair Employment Standard III: Wages and Benefits

### 4.1. Standard Requirements

- a. Each **ofi** workplace shall keep a readily accessible copy of the rates of Minimum Wage applicable to the Employees employed at that workplace. This shall cover:
  - i. The specified monthly/daily/hourly rate of Minimum Wage; and
  - ii. All possible exceptions and exemptions to the Minimum Wage applicable under law.
- b. **ofi** shall pay at least the Minimum Wage to each Employee and shall ensure that Employees' wages are paid on time (subject to any delay beyond **ofi**'s reasonable control) and in full, less all legally mandated deductions, such as taxes or social insurance, to the legally stipulated accounts or agencies as required by law.
- c. In cases where there is no applicable Minimum Wage, **ofi** shall pay the Industry Wage applicable for the location.
- d. **ofi** shall ensure that its employees shall receive Equal Remuneration.
- e. **ofi** shall ensure that any Employee returning to work following protected leave (including but not limited to maternity leave) return to the same or an equivalent role, paid at the same rate. (ILO Convention No. 183).
- f. In all circumstances, overtime shall be paid to Employees at a premium rate over the Employee's usual wage as required by relevant applicable law or contract.
- g. **ofi** shall not deduct employees' wages for disciplinary purposes.
- h. All lactating mothers are entitled to at least one 30-minute rest break per working day without deductions from employee wage, in line with international and local legal requirements.
- i. Employment will not be terminated during pregnancy or absence on their maternity leave or following the Employee's return to work until the child is 12 months old,



except on grounds unrelated to pregnancy, childbirth and its consequences, or nursing (ILO Convention 183).

- j. **ofi** shall ensure that a detailed pay slip is provided to every employee, with a breakdown of the wages, benefits and deductions, in writing, at each pay period as required by applicable international or local law or contract.

#### 4.2. Monitoring and Recordkeeping

**ofi** shall conduct regular audits of its payroll to ensure compliance with its Minimum Wage obligations, and shall maintain records of any Minimum Wage violations.

### 5. Fair Employment Standard IV: Diversity & Inclusion

**ofi** is an equal opportunity employer and we strive to promote diversity and inclusiveness at all levels in the organization.

#### 5.1. Standard Requirements

- a. **ofi** is an equal opportunity employer and strives to ensure that all employee life-cycle related processes/decisions are free of discrimination and harassment, whether in terms of race, ethnicity, country of origin, gender, sexual orientation, maternity status, socio-economic status, age, physical or mental abilities, religious beliefs, political beliefs, or other ideologies and any other protected categories as identified and required by local regulation/legislation.
- b. **ofi** shall develop a framework to promote employee development.
- c. **ofi** shall develop a framework to promote diversity.
- d. **ofi**'s commitment to the prevention of sexual Harassment is set out in **ofi**'s Prevention of Discrimination and Harassment Policy and other local relevant Policies.
- e. **ofi** shall make reasonable accommodations in providing opportunities for work arrangements that accommodate the diverse needs of individuals at different career and life stages in compliance with local regulatory/legislative requirements.
- f. **ofi** is committed to promoting the inclusion of workers within its workforce, as set out in the **ofi** Inclusion Diversity and Equity Policy and relevant local Policies.
- g. **ofi** shall ensure that its managers, supervisors and team leaders receive training regarding the understanding and promotion of Diversity and Inclusion, and prevention of Harassment in compliance with applicable laws.

#### 5.2. Monitoring and Recordkeeping

- a. **ofi** shall record the number of incidents of discrimination and Harassment during each reporting period.
- b. **ofi** shall record the status of each reported incident of discrimination and Harassment, and the resulting actions taken, regarding the following:
  - i. Whether the incident was investigated;
  - ii. Whether remediation plans are being implemented;
  - iii. Where remediation plans have been implemented, the results of the remediation plan;
  - iv. Any internal management review processes; and



- v. Whether the incident is no longer subject to action.

## 6 Fair Employment Standard V: Freedom of Association and Right to Collective Bargaining

### 6.1. Standard Requirements

- a. **ofi** shall respect the rights afforded to Employees under applicable law to collective bargaining.
- b. An employee's choice to form or join an association will not compromise their equal treatment at work.
- c. Where the right to freedom of association and collective bargaining is restricted under law, **ofi** shall develop alternate internal processes for collaborating with employees in managing workplace affairs.
- d. **ofi** shall conduct training of managers, supervisors, and worker representatives on applicable definitions, rights and procedures regarding Freedom of Association and Collective Bargaining, in relation to each applicable local jurisdiction.

### 6.2. Monitoring and Recordkeeping

- a. **ofi** shall maintain records of the total number of its workforce who are:
  - i. Members of a trade union; or
  - ii. Subject to a collective bargaining agreement.
- b. **ofi** shall maintain records of the total number and types of awareness training conducted by **ofi** in relation to Freedom of Association and Collective Bargaining.
- c. **ofi** shall maintain records of the operations and suppliers in which workers' rights to exercise Freedom of Association or Collective Bargaining may be violated or at significant risk either in terms of:
  - i. the type of operation (such as manufacturing plant) and supplier; or
  - ii. countries or geographic areas with operations and suppliers considered at risk.
- d. **ofi** shall maintain records of any local measures taken by **ofi** intended to support rights to exercise Freedom of Association and Collective Bargaining.



## Annex 1: Standard Maturity Levels

### Fair Employment Standard I: Prohibition of Child Labor and Forced Labor

#### 1.1 Level 1

1.1.1 Under no circumstances whatsoever, shall **ofi**:

- Employ any Child or allow any Child to work;
- Expose any Young Worker to hazardous work; or
- Use any Forced Labor;

1.1.2 All managers and supervisors shall be responsible for enforcing this policy.

#### 1.2 Level 2

All Contractor and Subcontractor businesses engaged by **ofi** shall be required, in relation to their workforce, to:

- Enforce the same rules referred to at 4.1 above, as a precondition for **ofi** engaging their services
- Enact and maintain defined mechanisms, systems, and processes for monitoring their compliance with the rules referred to at 4.1 above and shall ensure that they conduct regular audits to monitor their compliance.

#### 1.3 Level 3

All business partners, vendors, suppliers, and contributors to the workplace value chain have:

- these provisions referred to at 4.1 above as a precondition for engaging their service.
- Defined mechanism, systems and processes exist for monitoring compliance by the vendors, suppliers and contributors to the workplace value chain are followed/audited on a regular basis.

### Fair Employment Standard II: Workplace Conditions

#### 2.1 Level 1

2.1.1 **ofi** shall adhere to applicable laws relating to maximum number of working days, standard working hours, and overtime hours.

2.1.2 **ofi** shall ensure breastfeeding employees are entitled to one paid dedicated thirty-minute breastfeeding break per day during working hours in accordance with local laws.

2.1.3 Each **ofi** workplace shall have a readily accessible written process for ensuring a safe and healthy work environment.

#### 2.2 Level 2

2.2.1 **ofi** shall ensure breastfeeding employees are entitled to two dedicated paid thirty- minute breastfeeding breaks per day during working hours in accordance with local laws.

2.2.2 Each **ofi** workplace shall have a written and clearly defined grievance resolution mechanism.



2.2.3 Each **ofi** workplace shall have a defined mechanism, system and process for monitoring compliance by **ofi** labor contractors and shall conduct regular audits of such compliance.

### **2.3 Level 3**

2.3.1 All **ofi** employees shall have access to materials that informs them about Human Rights, and their rights and entitlements under applicable local employment regulations.

2.3.2 **ofi** shall ensure breastfeeding mothers are entitled to at least three dedicated, paid thirty-minute breaks per day during working hours, and/or flexible working time and location.

2.3.3 **ofi** shall, at a minimum, ensure worksites have at least a private non-dedicated breastfeeding support spaces with basic breastmilk storage equipment (refrigerator/cool storage space) and hand washing sink nearby or such other accommodations as required by law.

2.3.4 **ofi** shall ensure that specific measures are taken to welcome employees returning after a long leave due to parental leave and shall ensure that measures are in place for their assimilation in the workplace.

## **Fair Employment Standard III: Wages and Benefits**

### **3.1 Level 1**

3.1.1. **ofi** shall comply with its local obligations regarding Minimum Wage and overtime rates.

### **3.2 Level 2**

3.2.1. **ofi** shall pay employees' wages in compliance with the local customs and practices of that industry or sector.

### **3.3 Level 3**

3.3.1. **ofi** shall ensure that a fair compensation system is in place for all workers, which recognizes workers' respective qualifications, skill and experience and which recognizes and rewards them for their performance via financial and non-financial benefits or incentives.

## **Fair Employment Standard IV: Diversity & Inclusion**

### **4.1 Level 1**

4.1.1. Equal opportunity employer: the worksite is an equal opportunity employer and there is no discrimination against any minority group in any of the processes like recruitment, promotions, wages etc.

### **4.2 Level 2**

4.2.1. Specific measures are being taken to promote diversity in the worksite e.g., recruitment of women and minorities in the workforce

4.2.2. Special allowances are made for reasonable accommodation of employees with specific needs e.g., caring for infants/young children, employees in advanced age category.



### 4.3 Level 3

- 4.3.1. The workplace design makes reasonable accommodation for employees with special needs like ease of access for those with disabilities, or those needing special equipment for facilitating their productivity.

## Fair Employment Standard V: Freedom of Association and Right to Collective Bargaining

### 5.1 Level 1

- 5.1.1 Employees legal rights with regard to collective bargaining shall be respected by **ofi**.

### 5.2 Level 2

- 5.2.1 **ofi** shall provide each workers' association with the facilities and time to carry out their Freedom of Association activities.
- 5.2.2 **ofi** shall form Joint Consultative Councils to promote regular interaction with the association and site management representatives.

### 5.3 Level 3

- 5.3.1 **ofi** shall establish social dialogue on all aspects of work with its employees.