



## **FAIR TREATMENT AND GOOD WORKING CONDITIONS POLICY**

Eastern Produce Regional Services Limited (EPRS) is a specialized agricultural management company incorporated in Kenya, dedicated to supporting the growth and success of agricultural enterprises in which Camellia PLC has interest across East and Central Africa region. Through our integrated management model, we currently offer services to Eastern Produce Kenya Limited, Eastern Produce Malawi Limited, EP(T) East Africa Limited and Kakazi PLC.

### **Statement of Commitment**

EPRS is committed to complying with all applicable national laws and international labour regulations, including International Labour Organization (ILO) conventions and the Ethical Trading Initiative (ETI) Base Code.

The Company further strives to treat all employees, suppliers, service providers and contractors fairly and with respect. Any employees, suppliers, service providers and contractors are encouraged to adhere to the same commitments.

We endeavour to engage in fair employment practices which strive to maintain a workplace free from any kind of discrimination, harassment or intimidation.

This policy outlines the Company's adherence to the ETI Base Code, while also highlighting additional commitments that reflect its operational standards and best practices.

### **1. Employment is Freely Chosen**

EPRS prohibits all forms of forced, bonded, or involuntary prison labour. Workers are not required to lodge 'deposits' or their identity papers with the respective companies and are free to leave their employment after giving reasonable notice.

Employees have the right to terminate their employment as per the terms of their contracts, safeguarding their freedom of employment. These practices are aligned with ILO Conventions 29 and 105 and national legislation of subsidiary companies.

## **2. Freedom of association and the right to collective bargaining are respected**

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The client companies have signed Recognition Agreements and Collective Bargaining Agreements (CBAs) with the respective trade unions in their jurisdictions.

We adopt an open attitude towards the activities of trade unions and their organisational activities. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the client companies facilitate and do not hinder the development of parallel means for independent and free association and bargaining.

We allow trade union organisers to meet all employees, and allow employees to hold meetings and organise themselves as per the recognition agreement and the CBA.

## **3. Working conditions are safe and hygienic**

We are committed to providing a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and any specific hazards. Adequate steps are taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Workers receive regular and recorded health and safety training, and such training is repeated for new or reassigned workers.

Access to clean toilet facilities and potable drinking water, and, if appropriate, sanitary facilities for food storage is provided.

Accommodation, where provided, shall be clean, safe, meet basic needs of the workers, and be in line with ILO housing guidelines and local legal requirements.

Responsibility for health and safety is assigned to senior management representatives.

We have adopted an Occupational Safety and Health policy and conduct regular health and safety audits. Employees are provided with personal protective equipment (PPEs), where other mitigation measures are not possible, and have clear protocols for reporting workplace injuries. The client companies maintain well run health facilities on the farms that provide medical services to employees and their nuclear family living on the farm. Where the health facilities are not available on the farms, we make alternative arrangements with government health facilities for the provision of appropriate medical care to our employees.

The management formally and regularly consults and informs employees regarding any planned technical and organizational changes and any potential social, environmental or economic impacts.

#### **4. Child Labour Shall Not Be Used**

There is no recruitment of child labour in our operations. Our policies and practices prohibit the employment of any person under the age of 18. We develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child. We have assigned employees within our employee housing areas to check and monitor that all children of school-going age attend school.

Children and young persons under 18 shall not be employed at night or in hazardous conditions.

We verify the age of all potential employees through national ID cards or birth certificates to ensure compliance with national laws. Where ID cards and birth certificates are not available, we use appropriate government authorities to verify the ages of prospective employees.

In most cases, the client companies have allocated land within their properties for the construction of nursery, primary, and secondary schools to support the education of children from employee families and the local community.

#### **5. Living Wages Are Paid**

The client companies have payment systems, policies and procedures that compute the payment of wages in line with respective local labour laws and the CBAs. Employees receive pay in local legal tender.

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be sufficient to meet basic needs and allow for some discretionary income.

Wages paid are equal for all work of equal value no matter the gender, or nature of contract.

Workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time that they are paid

Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures shall be recorded.

Employees are entitled to annual leave in accordance with the labour laws of their respective countries and the applicable CBA.

Employees are granted sick leave in accordance with the Kenyan labour laws of their respective countries and the applicable CBAs. Female employees are entitled to maternity leave while Male employees are entitled to paternity leave as determined by the applicable labour legislation and the CBAs.

## **6. Working Hours Are Not Excessive**

Working hours comply with national laws, collective agreements, and the provisions below, whichever affords the greater protection for workers. The provisions are based on international labour standards.

Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week except where different thresholds are provided by local labour laws and CBAs.

All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, and in line with local labour laws and the CBAs.

The total hours worked in any 7-day period shall not exceed 60 hours except in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- the client companies can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Working hours, rest periods during the workday, the number of annual leave days, public holidays and rest days comply with current national labour laws and the CBAs.

## **7. No Discrimination is Practiced**

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, social class, colour, national origin, religion, age, disability, gender, marital status, sexual orientation, pregnancy, health status, union membership, political affiliation or any other motive as indicated by applicable laws, the ILO Conventions 100 and 111.

In addition, employees or prospective employees (once employed) have fair access to promotion and training irrespective of gender, age, ethnic origin, colour, marital status, political opinion, religion or social origin.

We maintain a zero-tolerance approach to sexual harassment, sexual exploitation, use of abusive language, threats, physical and intentional psychological mistreatment of employees. The grievance procedure for reporting any form of discrimination, harassment or intimidation includes designated confidential reporting channels, formal investigation steps, and protection from retaliation for all complaints, in accordance with the UN Guiding principles on Business and Human Rights.

In the event of any disciplinary or grievance procedures being necessary, we are committed to undertaking these processes in a fair and legally compliant manner without any forms of discrimination.

#### **8. Regular Employment Is Provided**

To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

The Company directly hires its workforce, except when a contractor is able to provide specialized or temporary services under the same environmental, social and labour conditions required by the national laws.

The Company has put in place recruitment and selection policy and procedures which, among other provisions, require that recruitment is conducted by committees rather than individuals. The policy and procedures aim to achieve a fair, transparent, structured and consistent approach to all recruitment and selection processes with clearly defined steps, roles and responsibilities. The policy further provides that any questions, concerns or complaints arising out of recruitment process are to be directed to the client company's Operational Grievance Mechanisms (OGM).

New employees are inducted in matters of OGM and the Sexual Harassment Awareness and Reporting procedures, Health and Safety procedures, Human Rights and Safe Working procedures.

Terms of work, covering labour policies, procedures, rules and conditions as stated in the CBA and contained in the employment contract are offered and explained to the employees in a language which they can understand.

#### **9. No Harsh or Inhumane Treatment Is Allowed**

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.