

# RWS GROUP

## Labour and Human Rights Policy

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**Approver:** Jim McHugh

**Version:** 2.0

**Issue Date:** 07/06/2023

**Next Review Date:** 07/06/2024

**Classification:** Public

**Retention Period:** Until superseded

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Classification:	Public	Next Review Date:	07/06/2024
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## 1 Document history

Name	Date	Detail	Version
Carla Matthews	22/02/2022	Document created	0.1
Harpreet Sagoo	21/03/2022	Approval	0.2
Jim McHugh	21/03/2022	Approved and published	1.0
Carla Matthews / Eva Luskova	26/05/2023	Amendments to 5.1 - Labour standards, salaries and benefits and 5.2 - Freedom of Association and Collective Bargaining and 5.5 - Child Labour	2.0
Jim McHugh	07/06/2023	Approval	2.0

## 2 Scope

RWS Holdings plc (“RWS” or “we”) recognises the protection of human rights. This policy details the obligations and responsibilities that RWS Holdings plc and its subsidiaries and affiliates (“RWS”) require all colleagues, third parties, contractors, business partners and their employees, personnel, agents, and subcontractors to adhere to when working with or for RWS.

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### 3 Policy and introduction

We seek to foster a culture which demonstrates respecting human rights guided by the international human rights principles encompassed in the International Bill of Human Rights, the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work, and the United Nations Global Compact.

We seek to identify and understand any adverse impacts that our actions or activities have on respecting the protection of internationally proclaimed human rights so that we are not complicit in human rights abuses. Where adverse impacts are identified, we take appropriate steps to mitigate or eliminate them.

We seek to engage with business partners that respect the protection of human rights and that demonstrate sound ethical performance. We expect our colleagues and all individuals who work for us, or on our behalf, to respect the human rights of others, and to subscribe to and work to uphold our approach to human rights as set out in this Policy.

### 4 Associated documents

- Health and Safety Policy
- Equality, Diversity and Inclusion Policy and Procedure
- Harassment, Bullying and Victimization Policy

### 5 Policy and introduction

The fundamental elements of our approach to labour and human rights include:

#### 5.1 Labour standards, salaries and benefits

We subscribe to labour standards, including hours, conditions, salaries, and overtime pay practices that are in compliance with the laws of the jurisdictions in which we operate.

We maintain processes to ensure that all employees have a contract of employment or offer letter (depending on the jurisdiction of employment) in a language they understand clearly indicating their rights and responsibilities with regard to wages, working hours, benefits and other working and employment conditions.

Our employees have the right to resign at any time and leave employment after meeting any conditions of contract and notice period recognized under applicable law.

We compensate employees competitively relative to the industry and local labour market, reflecting their individual responsibilities and contribution to business performance. We operate in compliance with applicable pay and benefits, work hours, holiday, overtime and benefit legislation.

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We have a range of policies in place to support employees in achieving balance between their work commitments and personal priorities including Maternity, Paternity, Adoption and Shared Parental Leave policies, agile and flexible working practices.

Any employee who, acting individually or jointly with other employees, considers that he has grounds for a grievance should have the right a) to submit such grievance without suffering any prejudice whatsoever as a result; and (b) to have such grievance examined pursuant to an appropriate procedure.

We believe in creating opportunities for our colleagues to improve their skills and capabilities and provides resources and opportunities for all employees to do so.

## 5.2 Freedom of Association and Collective Bargaining

Consistent with our commitment to respect ILO core labour standards, we respect freedom of association and collective bargaining. We respect the right of our colleagues to form, join or not join, a trade or labour union of their choice without fear of reprisal, intimidation or harassment. Any acts of interference in trade unions are prohibited. Where employees are represented by a trade or labour union or works councils consistent with local laws, we recognise the right of these bodies to represent employees. We will co-operate in good faith with the bodies that our employees choose to represent them. We believe in participating in constructive dialogue and good faith negotiations with freely elected employee representatives and we will provide those representatives with the information required to engage in meaningful negotiations. In respect of our activities, we will not tolerate attacks, or physical or legal threats, against those safely and lawfully exercising their right to freedom of association.

## 5.3 Health, safety and wellbeing

The health, safety and security of individuals in our workplaces is of fundamental importance to us. In conjunction and consultation with our colleagues, we work towards providing and maintaining healthy, safe and secure workplaces that identify, address and remediate identified risks of incidents, injury, negative impacts on health, and security concerns. We look to improve our efforts continually to provide healthy, safe and secure workplaces in line with our commitment to meeting our statutory obligations and in consideration of industry standards.

We believe that every individual should respect the health, safety, security and wellbeing of others and not put themselves or others in danger through careless or ill-considered actions.

## 5.4 Modern slavery, forced labour and human trafficking

We have zero tolerance for any form of modern slavery, forced and compulsory labour or human trafficking taking place resulting from our business processes. Our Modern Slavery and Human Trafficking Statement (Appendix A) forms part of this policy and includes steps we take to ensure that modern slavery and human trafficking is not occurring in our business or our supply chain.

## 5.5 Child labour

Exploitation of child labour is unacceptable under any circumstances. No person under the minimum legal working age applicable to their country may be employed by RWS. RWS works actively with suppliers who adhere to the same standards.

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## 5.6 Diversity and inclusion

We subscribe to equal employment opportunity principles and are intolerant of discrimination and harassment. We work to establish and maintain workplaces that are free from discrimination or harassment regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation, physical appearance, or other status protected by applicable law.

We base recruitment, hiring, placement, development, training, compensation and advancement on qualifications, competencies, skills, experience and performance. We value diversity and the opportunities that diversity brings to enhance our businesses.

We believe that all individuals should be treated, and treat each other, with dignity and respect. We do not tolerate inappropriate or disrespectful behaviour, unfair treatment or retaliation of any kind in, or related to, our workplaces.

## 5.7 Communities

We recognise that we are part of the communities in which we operate. We seek to respect the human rights of these communities, particularly in those areas where we have offices.

# 6 Guidance and reporting for colleagues

We foster a culture where open and honest communications among all individuals are valued and respected. Individuals are encouraged to raise concerns about poor or unacceptable practices or misconduct and can do so safely without fear of any form of retaliation. There are several ways in which colleagues can raise their concerns, including through the independent RWS Whistleblowing helpline, where reports can be made anonymously if desired, raising these with their direct manager or to members of the Group Executive Team through a dedicated internal email [compliance@rws.com](mailto:compliance@rws.com). We welcome people speaking up and we expect our colleagues to report any concerns in relation to human rights not being respected.

# 7 Public reporting

Our human rights-related commitments and efforts, consistent with this policy, are included the Sustainability section of our Annual Report.

# 8 Policy review

This Policy is available on the Group's intranet. If there are amendments to the applicable legislation or regulatory requirements, the Policy will be amended to reflect these. There will be an annual review by the person responsible for the Policy to ensure the document is fit for purpose and remains effective. Any changes will be communicated by email by way of the

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“Regulatory and compliance update”, team briefings or training, depending on the complexity of the amendment.

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