CORPORATE POLICY

Human Rights and Labour Policy

POLICY NUMBER	OPES-POL-08
VERSION	IFC
POLICY OWNER	Managing Director
APPROVED BY	Board of Directors, 6 March 2025
EFFECTIVE DATE	6 March 2024
NEXT REVIEW	12 months after approval
APPLIES TO	OPES personnel, subcontractors, suppliers and projects OPES develops

1. Policy statement

OPES respects internationally recognised human rights and is committed to fair and decent work. We seek to avoid causing or contributing to human rights harm through our own activities, and to prevent harm linked to our services, partners and supply chain.

2. Framework

This policy is based on:

- The UN Guiding Principles on Business and Human Rights
- The International Bill of Human Rights
- The ILO Declaration on Fundamental Principles and Rights at Work and the ILO core conventions
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- IFC Performance Standard 2 (Labour and working conditions)
- Ghana's Labour Act, 2003 (Act 651), and, for OPES's Norwegian operations, the Norwegian Working Environment Act and the Norwegian Transparency Act where it applies

3. Labour standards in OPES

Standard	OPES commitment
Forced labour	No forced, bonded, trafficked or prison labour. No retention of identity documents or recruitment fees charged to workers.
Child labour	No one under 18 employed in hazardous work, and no one below the legal minimum age employed at all

Standard	OPES commitment
Non-discrimination	Decisions on hiring, pay, promotion and termination based on merit, without discrimination on grounds such as gender, ethnicity, religion, disability, age, HIV status or political opinion
Equal pay	Equal pay for work of equal value
Wages and hours	At least the legal minimum wage, paid on time, with legal working hours, overtime pay, rest days and paid leave
Contracts	Written employment contracts in a language the worker understands
Freedom of association	Respect for the right to join or not join a trade union and to bargain collectively
Harassment and abuse	No harassment, bullying, physical or verbal abuse (see also OPES-POL-09)
Grievances	Access to a confidential grievance channel without fear of reprisal

4. Human rights due diligence

OPES carries out human rights due diligence proportionate to its size and risks:

1. **Identify** salient human rights risks in our own operations, our supply chain and the projects we develop or advise on, such as land rights, community security, labour conditions of contractors and the rights of women and vulnerable groups.
2. **Prevent and mitigate** these risks through contract terms, supplier screening, project design and engagement with affected people.
3. **Track** the effectiveness of our actions.
4. **Communicate** publicly how we address our risks, including any reporting required by the Norwegian Transparency Act.

5. Projects and communities

For projects OPES develops, we will respect land and tenure rights, follow IFC Performance Standard 5 on any land acquisition, and ensure security arrangements respect human rights in line with the Voluntary Principles on Security and Human Rights. We will engage communities and traditional authorities in good faith.

6. Supply chain

Suppliers and subcontractors must meet the labour and human rights standards in the Supplier and Third-Party Code of Conduct (OPES-POL-11). OPES screens higher-risk suppliers and will require corrective action, or end the relationship, where serious breaches are found.

7. Remedy

Where OPES has caused or contributed to harm, we will provide or cooperate in remedy. Concerns can be raised through the Whistleblowing Policy (OPES-POL-04) or a project grievance mechanism.

8. Responsibilities and review

The Managing Director is accountable for this policy. Line managers apply it in their teams, and the Compliance Officer supports due diligence. The policy is reviewed every 12 months.