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Employment and Labor Policy

Document Number: JCM-P-EL-2.0

Document Version Control

Date	Document Number	Prepared By	Approved By	Notes
2018-08-27	JCM-P-EL-0.1	Alan Cochran, ESG Director	To be approved by the BOD	Draft Employment and Labor Policy for Governance Committee review
2018-08-27	JCM-P-EL-1.0	Alan Cochran, ESG Director	To be approved by the BOD	Employment and Labor Policy incorporating FMO and Swedfund comments
2018-11-12	JCM-P-EL-1.0	Alan Cochran, ESG Director	JCM Board of Directors	Board Approved Policy
2020-09-02	JCM-P-EL-1.1	Martin Ritchie, Chief Risk Officer	Annual Review	Working review of Policy
2020-11-13	JCM-P-EL-2.0	Martin Ritchie, Chief Risk Officer	JCM Board of Directors	Board Approved Policy

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Abbreviations and Acronyms

Abbreviation / Acronym	Definition
CRO	Chief Risk Officer
CEO	Chief Executive Officer
GBVH	Gender Based Violence and Harassment
HR	Human Resources
IFC	International Finance Corporation
ILO	International Labor Organization
PS	Performance Standard
SDG's	United Nations Sustainable Development Goals

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Definition of Terms

Term	Definition
Project Affected Community	The Project Affected Community refers to communities associated with a Project usually defined in the Environmental and Social Impact Assessment as falling within the direct area of impact.
Workplace	This includes the Project site, areas within the Community, the JCM offices, and any other location where Employees fulfil their duties in the course of their employment.

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1 Employment and Labor Policy Statement

At JCM Power, we are committed to providing productive, non-discriminatory, exploitation-free, decent, safe and healthy working environments for our employees, both those who work for us directly, and those who work for us indirectly through contractors. We will achieve this by:

- Compliance with all relevant national and international environmental and social legislation as well as align with international best practice, including the IFC Performance Standards, the UN Guiding Principles on Business and Human Rights, ILO Core Labor Standards and ILO Basic Terms and Conditions of Employment, and contributing to the UN SDG's;
- The provision of equal opportunities for workers and by having a zero-tolerance policy to workplace discrimination, harassment or unfair treatment on the basis of race, color, age, sex, sexual orientation, gender reassignment, disability, religion or belief, political opinion, national extraction or social origin.
- Implementing measures which enable the prevention of GBVH as well as measures which enable our readiness to respond should it occur in both the workplace and the Project Affected Communities in which we operate.
- The development and implementation of a grievance mechanism;
- The development and implementation of health and safety policies and procedures;
- Preventing child and forced labor in all its forms in all project developments and operations;
- Promoting equal opportunities including the principle of fair and equitable remuneration whilst upholding legislation, policy and good practice in places where specific attention will be given to disadvantaged or minority groups;
- Protecting personal and private information in a legal and ethical manner;
- Respecting the right of employees to freedom of association and collective bargaining;
- Providing training and development opportunities and clear guidance on how to meet the expectations of each role; and
- Applying the same high standards to migrant, contract or temporary workers to protect their rights and vulnerabilities.

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2 Communication

The Employment and Labor Policy will be communicated to all employees, partners and stakeholders through the following mechanisms:

- Providing policy training to new hires;
- Electronic distribution of the policy to employees, investors and stakeholders;
- Providing public access to the policy on the JCM website; and
- By physical means to important stakeholders (that do not have access to internet).

3 Continual Improvement

The Employment and Labor Policy will be reviewed at least every three years to assess its relevance and coverage of Employment and Labor issues and, if necessary, updated.

4 Responsibility and Accountability

It is the responsibility of the CRO to implement this policy, monitor compliance, and take suitable corrective action when there is non-compliance. The CRO is also responsible for the review and revision of the policy.

The CEO of JCM will have ultimate accountability for JCM's compliance with the policy and will ensure that JCM executive management provide the necessary resources required to effectively implement the Employment and Labor Policy.

Approved by the board of directors as of **13 November 2020**.



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