



INTERNATIONAL SOS

Individual Rights Policy

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POLICY

**WORLDWIDE REACH.
HUMAN TOUCH.**

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1. INTRODUCTION

1.1. Introduction

- 1.1.1. As part of International SOS's commitment to the highest standards of social responsibility, this document has been produced as a policy on individual rights.
- 1.1.2. By providing employment, training healthcare and other benefits to our employees and by working with local service providers, Intl.SOS directly contributes to the well-being of individuals in over 200 countries and territories and therefore contributes significantly to supporting individual rights.
- 1.1.3. We also comply with the laws of the countries in which we operate, many of which are based on individual rights principles.
- 1.1.4. This policy applies to all International SOS employees and should be read in conjunction with other policies and guidelines, in particular, the Code of Conduct and Ethics, and the Data Protection Policy.
- 1.1.5. Intl.SOS pursues the protection of individual rights through our behaviour towards our employees, customers and service providers and we do not seek changes or to influence the behaviour of governments.

1.2. Purpose

Employees shall be mindful of the following issues:

- 1.2.1. Our approach to communities is based on mutual respect and hence respect for the rights of all people living near our operations.
- 1.2.2. Acknowledgement of individual rights forms a central part of how we treat our employees, customers and service providers.
- 1.2.3. In particular we:
 - (a) create awareness among employees of their responsibility to treat others in the company with fairness and respect and comply with the laws, policies and procedures regarding disciplinary action;
 - (b) do not employ child labour or forced labour;
 - (c) expect our service providers to treat their employees with dignity and respect;
 - (d) comply with the labour laws in the countries in which we operate;
 - (e) comply with our Health and Safety Policy;
 - (f) respect the privacy of the information provided to us by our employees, customers and service providers and comply with the laws on data protection and our Data Protection Policy; and
 - (g) comply with our Code of Conduct and Ethics Policy (the "Code") setting out clear rules on a number of issues, including discrimination and sexual harassment.

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- 1.2.4. We endeavour to ensure that our suppliers, contractors and other business partners are aware of our employment standards, including our prohibition on forced labour and child labour.

1.3. Intl.SOS's management systems

- 1.3.1. Employees shall ensure that individual rights issues are incorporated within our management systems. This means that:
- (a) the Code of Conduct and Ethics Questionnaire, which senior management completes each year, contains basic questions on risks to individual rights;
 - (b) managers shall be tasked with initiating activities that implement this Policy in their work places; and
 - (c) employees shall promptly provide the information requested by the Compliance team to enable the team to compile the annual International SOS Social Responsibility Report.



2. BACKGROUND

- 2.1. An internationally agreed definition of individual and human rights is contained in the Universal Declaration of Human Rights (the “Declaration”) provided in 1948 by the United Nations General Assembly.
- 2.2. Individual and human rights are universal values. All member countries of the UN – developed and developing – have endorsed the Declaration, a document based on wide-ranging consultation across different cultures.
- 2.3. Human rights, as defined in the Declaration, include economic, social and cultural rights, such as the right to work, to educate, to respect for culture, and to a decent standard of living.
- 2.4. Other important documents on human rights are the International Covenant on Civil and Political Rights (the “Covenant”), the International Covenant on Economic, Social and Cultural Rights, and the core labour standards of the International Labour Organisation (the “Standards”).



3. POLICY

3.1. Politics

- 3.1.1. Intl.SOS is not a political organization and the Code requires that employees avoid using Intl.SOS's name and assets in connection with political campaigns and political parties.
- 3.1.2. Intl.SOS pursues the protection of individual rights through our behaviour towards our employees, customers and service providers and we do not seek changes or to influence the behaviour of governments.

3.2. Communities

Understanding the perspectives of local people

- 3.2.1. An important aspect of community relations is the need to understand the impact that operations can have on the local communities. We contribute to the health and well-being of communities by bringing medical services to many of the communities in which we operate.
- 3.2.2. We shall increase awareness among our employees on the need to respect attitudes, beliefs and values. Our employees shall draw attention to any gaps or inadequacies in our policies, processes or procedures in this respect. Cross-cultural awareness is vital for our employees, so that they can fulfil their responsibilities as neighbours and co-workers.

Communications

- 3.2.3. Regular consultation and a clear channel of communication with managers for complaints about the way in which we treat people are important values to Intl.SOS. Complaints shall be recorded and dealt with promptly and thoroughly. Interactions on such issues shall be beyond reproach, as suspicions of malpractice can easily undermine trust.

3.3. Employees

- 3.3.1. Key human rights principles are contained in the Declaration and the Standards. The Declaration sets out principles on the elimination of forced labour, child labour, and discrimination. Intl.SOS respects these principles and shall enforce them in the work place.

Code of Conduct and Ethics (the "Code") and complaints

- 3.3.2. The Code shall be communicated to employees effectively. Complaints can be raised using the following e-mail address Compliance@internationalsos.com.
- 3.3.3. Complaints shall be dealt with promptly, fairly and impartially.
- 3.3.4. Employees shall be made aware of the existence of this procedure. Legitimate use of this e-mail address will not result in disciplinary action.

Discrimination and harassment

- 3.3.5. The Code states that Intl.SOS employs people without discriminating on grounds of age, ethnic or social origin, gender, sexual orientation, politics or religion.
- 3.3.6. Fulfilling this commitment is crucial to our business.
- 3.3.7. The Code also prohibits harassment in the workplace and protecting employees against sexual harassment is an important part of the Code. Employees shall be made aware of what is acceptable and unacceptable behaviour.

Conditions of work and wages

- 3.3.8. Protecting employees and excellence in managing health and safety are essential to our long term success. We shall comply with health and safety laws and regulations within the country in which we operate and adhere to the Health and Safety Policy.
- 3.3.9. Intl.SOS provides fair and equitable remuneration. We must strive to attract and retain the best in our industry. Wages are reviewed annually and benefits are reviewed regularly. Processes and procedures are in place to assess and reward performance and shall be used to ensure that we remain competitive.
- 3.3.10. We shall ensure that working hours meet the market level, overtime is strictly voluntary and we meet our legal obligations in respect of benefits. We strive to ensure a healthy and balanced work life.

Education, training and development

- 3.3.11. Intl.SOS strives to improve our employees' skills and competencies by regular performance reviews, recognizing potential, undertaking education, training and coaching as appropriate, and offering professional development opportunities within Intl.SOS. Employees need to derive job satisfaction from working for Intl.SOS. Managers shall be encouraged to provide assistance for training and to develop the employee's present job and future careers.

Child labour and forced or bonded labour

- 3.3.12. We shall not employ forced, bonded or child labour.

Confidentiality and Data Protection

- 3.3.13. Employees are required by their contracts of employment, the Code, the Data Protection Policy, the Information Security Policy and the law to respect privacy and to protect personal and confidential data. Employees shall be encouraged to understand and respect the data protection laws that affect Intl.SOS in their location. Employees may raise complaints about data protection issues to their local Data Protection Administrator, the Compliance Department or the Group General Counsel.

Suppliers, contractors and other business partners

3.3.14. We expect our service providers to respect the rights of their employees too. We shall ensure that our contractors and suppliers are aware of the standards that we expect from them. We shall continue to monitor our medical service providers through surveys and site visits.

4. ENFORCEMENT, AUDITS AND REPORTING BREACHES

- 4.1. The conduct of each employee has an important effect on our reputation and our future. Breaches of this policy may lead to disciplinary action that may include dismissal.
- 4.2. Employees are expected to promptly and fully report any breaches to their supervisor, the Group General Counsel or the Legal team. Reports made in good faith by someone who has not breached this policy will not reflect badly on that person or their career with us and will not result in disciplinary action.
- 4.3. If the supervisor, the Legal team or the employee's HR representative cannot resolve a matter or if they are part of the problem, the matter can be addressed to the following confidential email box:
A.Vaissier@internationalsos.com.

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