



Fair Employment Policy



Introduction

We're committed to providing a workplace where the rights of all employees are respected. Our approach to Fair Employment is aligned to our Core Purpose of Growing Responsibly and is in full compliance with the conventions of the International Labour Organization (ILO) and United Nations Global Compact's (UNGC) guiding principles on human rights and labour.

This Policy is for broad reference only. Provisions contained in this Policy may be modified from place to place as per local laws and regulations. Please consult your local HR department for the authorised copy of the policy applicable in your location. This policy is not applicable in the US.

Our Goal is to treat all our employees with dignity and fairness, and to take a proactive approach to protecting the rights of people in all our workplaces.

To achieve this goal, we will:

- ensure compliance with all applicable national employment laws and international standards.
- create a fair and non-discriminatory workplace that provides equal opportunity to everyone.
- establish, maintain, and improve the worker-management relationship and ensure employees' rights to self-representation.
- protect workers, including vulnerable categories such as migrant workers and workers engaged through third-parties.
- prohibit the use of child labour and forced labour.
- provide safe and healthy working conditions and promote the health of workers.

For the management and implementation of this and all policies, we will:

- require all levels of Olam Agri management to be accountable for applying the policy in their business decisions.
- ensure all managers, supervisors, employees, and contractors understand this policy and their own responsibilities and accountabilities and receive appropriate training and support for success.

- establish strategies and management systems to create and prioritise measurable objectives, and execute improvement plans that address our significant risks, impacts and opportunities.
- communicate and publicly report meaningful and accurate information regarding our performance to demonstrate continual progress towards commitments made in our policies.
- regularly review this Policy for alignment with our 'Shared Value' and key stakeholder expectations.



Fair Employment Standards

There are six standards associated with Olam Agri's Fair Employment Policy.

These are:

1 Prohibition of Child Labour & Forced Labour

2 Workplace Conditions

3 Wages and Benefits

4 Diversity & Inclusion

5 Health & Nutrition

6 Freedom of Association & Right to Collective Bargaining

Scope

The scope of Standards associated with the Fair Employment Policy applies to all Olam Agri workplaces where Olam Agri maintains management control, including plantations, projects, farms, processing facilities, warehouses, and offices.

Responsibilities

Respective Country Heads, Business Heads and Function Heads have primary responsibility to ensure that all the workplaces under their jurisdiction adhere to the policy and review them annually.

The head of any workplace is responsible for ensuring day to day implementation and operational control for the provisions described in this Policy.

The HR lead for the workplace is responsible for the development of required processes and the review framework specific to a given workplace.

Definitions

Workplace refers to all offices, processing sites, farms/ plantations/ concessions, projects, and warehouses directly or indirectly managed by Olam Agri, where work is done for Olam Agri.

All terms denoting people employed by Olam Agri e.g. workers, employees – unless otherwise specified – refer to:

- The collective noun
- Those employed directly by Olam Agri or indirectly through labour subcontractors.
- All categories – Permanent or Fixed Term, employed Full-Time, Part Time or Seasonal.

These definitions, scope and responsibilities apply as common to all standards, in addition to any other requirement associated with a given standard.

Standard 1. Prohibition of Child Labour & Forced Labour

No Olam Agri workplace must allow the use of child labour or forced labour, either directly or through a sub-contractor.

Under no circumstances should any Olam Agri worksite employ an individual under the local legal minimum age for work determined by national laws or regulations or by the competent authority.

Individuals need to be 18 years old (minimum) for admission to any type of employment or work, which by its nature or the circumstances is likely to jeopardise health, safety, or morals of said individual.

No Olam Agri workplace must permit the physical punishment, abuse or involuntary servitude of any worker. Procedures are in place to ensure that workers enter into employment of their own free will and are never prevented from leaving if they choose to do so.

All managers, supervisors and worker representatives must be trained on the applicable definitions of child labour and forced labour.

All Olam Agri labour contractors must maintain a roster of approved workers and only approved and verified workers are allowed access to Olam Agri premises to work.

Information maintained for verified workers must contain:

- proof of age
- work authorisation in the case of migrant workers
- registration with the applicable social security organisation.

Monitoring & Record-keeping

The following should be monitored and recorded as appropriate:

- Operations considered to have significant risk for incidents of:
 - Child labour
 - Young workers exposed to hazardous work.
- Measures taken to contribute to the effective abolition of child labour.
- Operations and suppliers considered to carry significant risk of incidents of forced or compulsory labour.
- Measures taken to the elimination of all forms of forced or compulsory labour.

Definitions

- **'Child labour'** refers to employment of children in an industry or business, for work that deprives them of their childhood, their potential and their dignity, and that's harmful to their physical and mental development.
- **'Minimum age'** is the minimum age required by law for a person to work in a given jurisdiction.
- **'Forced labour'** is any work or service which is exacted from any person and not offered voluntarily. Providing wages or other compensation to a worker for such a service does not make it not forced or compulsory.

Standard 2. Workplace Conditions

All our workplaces must treat employees with dignity, fairness and respect, and our employee and employment-related practices are guided by our shared values and Code of Conduct.

We must provide a safe working environment to employees, with documented health and safety measures, and standard operating processes covering all relevant aspects of work posing potential risks to employee physical and mental health, and safety.

All our employees must receive training on workplace safety, defined under the Standard Safe System of Work in our Health and Safety Policy.

All our workplaces must comply with applicable local laws related to maximum number of working days, standard working hours and overtime hours.

All employees must be provided with a written, understandable, and legally binding employment contract, and the terms and conditions as specified in the contract must be respected.

All workplaces must have a written process for grievance resolution in place.

- It must clearly specify responsible authority, escalation mechanism and process for resolving issues raised.
- It must have provision for keeping the name of the complainant confidential.
- There must not be any discrimination or punitive action against any employee raising a grievance.
- The grievance process must be clearly communicated to all employees.

All our workplaces must undertake training of top leadership, managers supervisors and team leaders on human rights, employment law framework in jurisdiction, industry best practices and associated ILO conventions.



Monitoring & Record-keeping

The following should be monitored and recorded as appropriate:

- **Human Rights**

The total number and percentage of operations that have been subject to human rights reviews, including instances of sexual harassment or human rights impact assessments, by location.

- **Employee Safety and Health**

Details of all safety-related incidents as described under Olam Agri's Safety and Health Policy.

- **Employee Grievances**

The details of all grievances received during the reporting period, including those made anonymously. This should include complaints of sexual harassment raised through procedures defined in the Company's policy against sexual harassment. All investigation report and the action taken will also be recorded.

- **Employee Records**

- The total number and rate of new employee hires during the reporting period, by age group, gender, and location.
- The total number and rate of employee turnover during the reporting period, by age group, gender, and location.
- The total number of employees without a legal contract, by gender and location.

- **Training and Education**

- The total number of hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations.
- The percentage of employees trained during the reporting period in human rights policies or procedures concerning aspects of human rights relevant to operations.
- The percentage of managers/team leaders trained during the reporting period in applicable employment laws and associated ILO conventions.
- The average hours of training that the organisation's employees have undertaken during the reporting period, by:
 - Gender
 - Employee category
 - The type and scope of programmes implemented, and the assistance provided to upgrade employee skills.
 - The total percentage of employees by gender and by employee category who received a regular performance and career development review during the reporting period.

Definitions

- **'Working conditions'** include physical infrastructure and environment, conducive to the work being carried out in the workplace. Where applicable, this includes safe housing conditions, with access to potable drinking water, adequate sanitation, and emergency medical care.
- **'Safe working environment'** refers to the complete physical and mental wellbeing of the employees. It includes a welcoming workplace, free of abuse (including sexual harassment), and the prevention of risk to health caused by working conditions.
- **'Human Rights'** are the basic rights and freedoms that belong to every person in the world. They're based on important principles such as dignity, fairness, respect, and equality. They're universal, inalienable and apply to everyone in equal and non-discriminatory manner.

Standard 3. Wages & Benefits

Each of our workplaces must comply with the minimum wage and ensure that wages are paid on time and in full, with all legally mandated deductions, such as taxes or social insurance, deposited to the legally stipulated accounts or agencies as required by law.

Each Olam Agri workplace must keep a copy of the rate of minimum wages applicable to that workplace. This clarification should cover:

- The specified monthly/daily/hourly rate of wages.
- All possible exceptions and exemptions as applicable under law.

In cases where there's no minimum wage defined, the management must pay the industry wage applicable to the location.

Management must ensure that both women and men have the right to equal remuneration for work of similar nature or equal value. This includes all additional income including the rate of overtime payment.

Monitoring & Record-keeping

The following should be monitored and recorded as appropriate:

- An audit of payroll to ensure compliance to minimum wages.
- A record of any violation of minimum wages in a specified period.
- Measures taken by the organisation in the reporting period intended to ensure such violations are not repeated.

Definitions

- **'Minimum wage'** is the lowest remuneration that employers must legally pay their workers in any given jurisdiction.
- **'Industry wage'** is the standard wage prevalent in any given sector or industry in a defined region.
- **'Equal remuneration'** for men and women workers for work of equal value refers to rates of remuneration established without discrimination based on sex.

Standard 4. Diversity & Inclusion

We're an equal opportunity employer and we strive to promote diversity and inclusion at all levels in the organisation.

All our workplaces must be an equal opportunity employer and all employee lifecycle-related processes/decisions must ensure there's no discrimination based on race, ethnicity, country of origin, gender, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other ideologies.

Our workplaces must make reasonable allowances in providing opportunities for work arrangements that accommodate the diverse needs of individuals at different career and life stages.

Our workplaces must undertake training of managers, supervisors and team leaders on concept, benefits and practice of behaviours and processes that promote diversity and inclusion.

Monitoring & Record-keeping

The following should be monitored and recorded as appropriate:

- The total number of incidents of discrimination during the reporting period.
- The status of the incidents and actions taken regarding the following:
 - Incidents reviewed by the organisation.
 - Remediation plans being implemented.
 - Remediation plans that have been implemented, with results reviewed.
 - Internal management review processes
 - Incidents no longer subject to action.

Definitions

- **'Diversity'** is acceptance of a range of human differences, including but not limited to: ethnicity, religion, gender, age, nationality, sexual orientation, ability, citizenship status or relationship status.
- **'Inclusion'** is about focusing on the needs of every individual and ensuring the right conditions are in place for each person to achieve his or her full potential.

Standard 5. Workplace Health & Nutrition

All employees should have access to adequate clean, potable water and safe, hygienic food during working hours. Our worksites must ensure this.

An annual assessment of each worksite is required to gauge employee access to:

- Clean and potable water.
- Safe and hygienic food during working hours.

Any gaps identified in the assessment should be prioritised, and a plan of actions and the budget required to implement them should be completed.

Monitoring & Record-keeping

The following should be monitored and recorded as appropriate:

- Maintenance of records of the annual assessment, and the actions planned and implemented.
- Any location in violation of the Standard.
- Corrective actions taken.

Definitions

- **'Diversity'** is acceptance of a range of differences, including but not limited to race, ethnicity, country of origin, gender, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other ideologies.
- **'Access'** refers to physical availability and access to food at the workplace.
- **'Sufficient'** refers to the quantity of food sufficient to meet the daily calorific needs of the workers, particularly of those engaged in hard physical labour or those with special needs.
- **'Safe'** refers to clean and potable water, and to food prepared and stored in hygienic conditions
- **'Nutritious'** means food that provides essential carbohydrates, proteins, vitamins, and minerals required as part of a healthy diet.

Standard 6. Freedom of Association & Right to Collective Bargaining

Workers must have the right to join or to refrain from joining representative associations of their choice and to bargain collectively. A worker's choice to form or join an association must not compromise their equal treatment at work.

Where the right to freedom of association and collective bargaining is restricted under law, the management must develop alternate internal processes for collaborating with workers in managing workplace affairs, e.g. Joint Consultative Council defined under level 2 of maturity.

Managers, supervisors, and worker representatives should be trained on the applicable definitions, rights and procedures as defined under the local jurisdictions.

Monitoring & Record-keeping

The following should be monitored and recorded as appropriate:

- The number of total workforce under protected category (if applicable)
- The percentage of protected workers covered under unions.
- The percentage of protected workers covered under a collective bargaining agreement.
- The number and types of awareness training conducted.
- The operations and suppliers in which workers' rights to exercise freedom of association or collective bargaining may be violated or at significant risk, either in terms of:
 - The type of operation (such as manufacturing plant) and supplier.
 - The countries or geographic areas with operations and suppliers considered at risk.
- The measures taken by the workplace in the reporting period intended to support rights to exercise freedom of association and collective bargaining.

Definitions

- **'Freedom of Association'** refers to the right of all workers to join or to refrain from joining an association representing their collective interests.
- **'Collective Bargaining'** is the way management and worker representatives agree on conditions of employment and provisions governing workplace affairs.



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