



COOL FRESH INTERNATIONAL

HUMAN RIGHTS POLICY

Cool Fresh International is committed to integrating human rights best practices into our business processes and to inform our decision-making and due diligence processes.

Our human rights policy mandates that we operate in a way that respects the human rights of all employees and the communities in which we operate our business.

This policy recognizes that while governments have the primary responsibility to protect human rights, our activities have the potential to impact the human rights of individuals affected by our business operations.

We are committed to continual improvement in the area of human rights, and to that end, we seek constructive dialogues and partnerships with a variety of stakeholders on our human rights performance, especially those impacted directly by our operations.

To meet our responsibilities to respect human rights, Cool Fresh International makes the following commitments:

1. All our employees will uphold and respect the human rights set forth in the Universal Declaration of Human Rights and international humanitarian law.
2. We respects the rights and dignity of employees, contractors, and local communities and we are committed to providing equal opportunity and freedom from discrimination for all.
3. We respects workers rights, including freedom of association, the right to peaceful protest and assembly, and engagement in collective bargaining in association with the International Labor Organization (ILO) conventions on organizing and collective bargaining.
4. Organization (ILO) conventions on organizing and collective bargaining.
5. We respect the rights and traditions of indigenous peoples in association with ILO Convention 169 and seeks to protect cultural and spiritual heritage as well as the environment.
6. We support the elimination of all forms of forced, compulsory and child labour.
7. Where we – or any of our suppliers - hire private security forces to protect employees, contractors, partners, resources, and company property, the contractors will be required to comply strictly with local and international law and with the Voluntary Principles on Human Rights and Security.
8. We will work to minimize involuntary resettlement of workers wherever possible.
9. All Cool Fresh International employees will receive information regarding our Human Rights Policy & Code of Conduct.
10. We are committed to continual improvement of the human rights standards and practices of our suppliers, and to that end we will regularly review and assess the effectiveness of and their compliance with international human rights standards.
11. We will take appropriate measures to ensure that contractors and partners respect this policy.

Our commitment to respect human rights also is supported by our Corporate Governance & Corporate Integrity Policy.

Our commitment to respect human rights is informed by international law, including:

- ILO Convention 29 on Forced or Compulsory Labour
- ILO Convention 87 on Freedom of Association and Protection of the Right to Organize
- ILO Convention 98 on Right to Organize and Collective Bargaining
- ILO Convention 100 on Equal Remuneration
- ILO Convention 105 on Abolition of Forced Labour
- ILO Convention 111 on Discrimination (Employment and Occupation)

- ILO Convention 138 on Minimum Age
- ILO Convention 169 on Indigenous and Tribal Peoples
- ILO Convention 182 on Worst Forms of Child Labour
- International Convention on Economic, Social and Cultural Rights
- International Covenant on Civil and Political Rights
- Organization for Economic Co-operation and Development Guidelines
- Report of the Special Representative of the Secretary-General on the issue of human rights and transnational corporations and other business enterprises (John Ruggie)
- Voluntary Principles on Security and Human Rights
- United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials
- United Nations Code of Conduct for Law Enforcement Officials
- Universal

From these laws we have compiled our Code of Conduct for human rights, which apply to our own operations worldwide.

In addition, our suppliers will receive a copy hereof, and will be strongly requested to ensure compliance hereof within their operations.

CODE OF CONDUCT

Freedom of Association and the Right to Collective Bargaining

- All personnel shall have the right to form, join, and organise trade unions of their choice and to bargain collectively on their behalf with the company.
- The company shall respect this right, and shall effectively inform personnel that they are free to join an organisation of their choosing and that their doing so will not result in any negative consequences to them, or retaliation, from the company.
- The company shall not in any way interfere with the establishment, functioning, or administration of such workers' organisations or collective bargaining.
- In situations where the right to freedom of association and collective bargaining are restricted under law, the company shall allow workers to freely elect their own representatives.
- The company shall ensure that representatives of workers and any personnel engaged in organizing workers are not subjected to discrimination, harassment, intimidation, or retaliation for reason of their being members of a union or participating in trade union activities, and that such representatives have access to their members in the workplace.

Prohibition of Discrimination

No discrimination shall be tolerated in hiring, remuneration, access to training, promotion, termination or retirement based on gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in workers' organisations including unions, political affiliation or opinions, sexual orientation, family responsibilities, marital status, or any other condition that could give rise to discrimination.

Compensation

- Wages paid for regular working hours, overtime hours and overtime differentials shall meet or exceed legal minimums and/or industry standards.
- Illegal, unauthorised or disciplinary deductions from wages shall not be made. In situations in which the legal minimum wage and/or industry standards do not cover living expenses and provide some additional disposable income, supplier companies are further encouraged to provide their employees with adequate compensation to meet these needs.
- Deductions from wages as a disciplinary measure are forbidden, unless this is permitted by national law and a freely negotiated collective bargaining agreement is in force.
- Supplier companies shall ensure that wage and benefits composition are detailed clearly and regularly for workers; the supplier company shall also ensure that wages and benefits are rendered in full compliance with all applicable laws and that remuneration is rendered in a manner convenient to workers.

- All overtime shall be reimbursed at a premium rate as defined by national law. In countries where a premium rate for overtime is not regulated by law or a collective bargaining agreement, personnel shall be compensated for overtime at a premium rate or equal to prevailing industry standards, whichever is more favourable to workers' interests.

Working Hours

- The supplier company shall comply with applicable national laws and industry standards on working hours and public holidays.
- The maximum allowable working hours in a week are as defined by national law but shall not on a regular basis exceed 48 hours and the maximum allowable overtime hours in a week shall not exceed 12 hours.
- Overtime hours are to be worked solely on a voluntary basis and to be paid at a premium rate.
- In cases where overtime work is needed in order to meet short-term business demand and the company is party to a collective bargaining agreement freely negotiated with worker organisations (as defined above) representing a significant portion of its workforce, the company may require such overtime work in accordance with such agreements.
- Any such agreement must comply with the requirements above. An employee is entitled to at least one free day following six consecutive days worked. Exceptions to this rule apply only where both of the following conditions exist:
 - a) National law allows work time exceeding this limit; and
 - b) A freely negotiated collective bargaining agreement is in force that allows work time averaging, including adequate rest periods.

Workplace Health and Safety

- The company shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to workers' health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the workplace environment, and bearing in mind the prevailing knowledge of the industry and of any hazards.
- A clear set of regulations and procedures must be established and followed regarding occupational health and safety, especially the provision and use of personal protective equipment, access to clean toilet facilities, access to potable water and if appropriate, sanitary facilities for food storage shall be provided.
- The company shall ensure that any dormitory facilities provided for personnel are clean, safe, and meet the basic needs of the personnel.
- All personnel shall have the right to remove themselves from imminent serious danger without seeking permission from the company.
- Workplace practice and conditions in dormitories which violate basic human rights are forbidden.
- In particular young workers shall not be exposed to hazardous, unsafe or unhealthy situations.
- In particular, a management representative responsible for the health and safety of all personnel and accountable for the implementation of the Health and Safety elements shall be appointed.
- All personnel shall receive regular and recorded health and safety training, moreover, such training shall be repeated for new and reassigned personnel.
- Systems to detect, avoid or respond to potential threats to health and safety of all personnel shall be established

Prohibition of Child Labour

- Child labour is forbidden as defined by ILO and United Nations Conventions and/or by national law. Of these various standards, the one that is the most stringent shall be followed.
- Any forms of exploitation of children are forbidden.
- Working conditions resembling slavery or harmful to children's health are forbidden.
- The rights of young workers must be protected.
- The company may employ young workers, but where such young workers are subject to compulsory education laws, they may work only outside of school hours.
- Under no circumstances shall any young worker's school, work, and transportation time exceed a combined total of 10 hours per day, and in no case shall young workers work more than 8 hours a day.
- Young workers may not work during night hours.

Prohibition of Forced and compulsory Labour and Disciplinary Measures

- All forms of forced labour, such as lodging deposits or the retention of identity documents from personnel upon commencing employment, are forbidden as is prisoner labour that violates basic human rights.
- Neither the company nor any entity supplying labour to the company shall withhold any part of any personnel's salary, benefits, property, or documents in order to force such personnel to continue working for the company.
- Personnel shall have the right to leave the workplace premises after completing the standard workday, and be free to terminate their employment provided that they give reasonable notice to their employer.
- Neither the company nor any entity supplying labour to the company shall engage in or support trafficking in human beings.
- The company shall treat all personnel with dignity and respect. The company shall not engage in or tolerate the use of corporal punishment, mental or physical coercion and verbal abuse of personnel.

Environment and Safety Issues

Procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, emissions and effluent treatment must meet or exceed minimum legal requirements.

Management Systems

- The company shall define and implement a policy for social accountability.
- Management is responsible for the correct implementation and continuous improvement by taking corrective measures and periodical review of the Code of Conduct, as well as the communication of the requirements of the Code of Conduct to all employees.
- It shall also address employees' concerns of non compliance with this Code of Conduct.

APPROVED BY THE SHAREHOLDERS OF COOL FRESH INTERNATIONAL BV