

# Human Rights Policy

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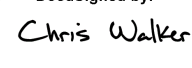

## Revision History

Version	Date	Revision Author	Summary of Changes
V1.0	14.12.2017	Barbara Obeng	Release version
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## Distribution

Name	Title
All Nextgen Clearing	Everyone

## Approval/Reviewed

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# 1 Introduction

## 1.1 Scope

This policy applies to all, people and processes within Nextgen Clearing, including board members, directors, employees, contractors, consultant, suppliers and other third parties who have dealings with Nextgen Clearing Ltd.

## 1.2 Related Documents

The following policies and procedures or guides are relevant to this document:

- Human Rights -Leaders Guide
- Human Rights – Employee Guide
- IMS13010 CCTV Policy and Procedure
- IMS26003 Code of Conduct
- Disciplinary & Grievance Procedure
- IMS26002 Environmental Policy

## 1.3 Purpose

The purpose of the Nextgen Clearing Human Rights Policy is to communicate to our employees, customers, suppliers, shareholders, and the communities we serve, the ethical and social values we respect and our commitment to uphold human rights by promoting our values of being a Winner, an Owner, a Trooper and an Innovator. Through these principles we aim to be an aspiring business for people to join and be associated with.

Respect for human rights is fundamental to the sustainability of Nextgen Clearing Ltd. and the communities in which we operate. In our Company and across our system, we are committed to ensuring that people are treated with dignity and respect.

Nextgen Clearing Ltd.'s Human Rights Policy is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights. The Human Rights Policy applies to Nextgen Clearing Ltd., the entities that it owns, the entities in which it holds a majority interest, and all the hubs worldwide.

The Company is committed to working with and encouraging our partners to uphold the principles in this Policy and to adopt similar policies within their businesses.

## 2 What are Human Rights?

Human Rights are the universal rights that every human being is entitled to enjoy and to have protected. They are most appropriately defined as those rights that require us to treat others as we ourselves would want to be treated, and which protect us – as individuals and groups – from abuses of power. We have adopted a series of human rights principles across the business:

### 2.1 General Principles

- We are committed to performing our business to the highest standard of ethics and in accordance with our values.
- We are open and fair in dialogue with all our stakeholders and commit to communicate effectively and courteously with external parties.
- We respect all fundamental human rights and will be guided in the conduct of our business by the provisions of the United Nations Universal Declaration of Human rights (UNUDHR), the International Labour Organisation's (ILO) core labour standards and national legislation.

## 3 Respect for Human Rights

Nextgen Clearing Ltd. respects human rights. It is committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities before or if they occur through human rights due diligence and mitigation processes.

## 4 Community and Stakeholder Engagement

The Company recognises its impact on the communities in which it operates.

- We are committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business.
- Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business.
- We believe that local issues are most appropriately addressed at the local level.
- We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

## 5 Valuing Diversity

The Company values the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment.

We are dedicated to maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, colour, national or social origin, religion, age, disability, sexual orientation, philosophical belief, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, training,

compensation and advancement at the Company is qualifications, performance, skills and experience.

Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. These principles apply not only to Company employees but also to the business partners with whom we work.

## **6 Freedom of Association**

The Company respects our employees' right to join or not to join a labour union without fear of reprisal, intimidation or harassment.

## **7 Safe and Healthy Workplace**

The Company provides a safe and healthy workplace and complies with applicable Health & Safety laws, regulations and internal requirements. We are dedicated to maintaining a productive workplace by minimising the risk of accidents, injury and exposure to health risks. We are committed to engaging with our employees to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

## **8 Workplace Security**

The Company is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity as outlined in the relevant CCTV Policy.

## **9 Forced Labour, Human Trafficking and Child Labour**

The Company prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking. The Company prohibits any form of child labour in the locations we operate.

## **10 Work Hours, Wages and Benefits**

The Company compensates employees competitively relative to the industry and local labour market. We operate in full compliance with applicable wage, work hours, overtime and benefits laws.

## 11 Learning & Development

All employees shall receive an appropriate level of training to enable them to perform their duties and have equal opportunities on advancing their development.

## 12 Environmental Impact

Conserving and protecting the environment is a principle of high importance. We shall not engage in activities that have unacceptable risks and such risks shall be identified as early as possible with a view to facilitating timely and appropriate actions.

- We shall seek to avoid methods of operation which give rise to environmental risks where there are suitable alternatives available and shall endeavour, within our remit, to ensure our clients and supply chain strive for environmentally positive options whenever possible.
- We shall adopt systems which allow the impact of our work on the environment and communities to be evaluated

## 13 Guidance and Reporting for Employees

Nextgen Clearing creates workplaces in which open and honest communications among all employees are valued and respected. The Company is committed to following all applicable labour and employment laws wherever we operate.

If you believe that a conflict arises between the language of the policy and the laws, customs and practices of the place where you work, if you have questions about this policy or if you would like to report a potential violation of this policy, you should raise those questions and concerns through existing processes, which make every effort to maintain confidentiality.

You may ask questions or report potential violations to local Management or Human Resources.

No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company is committed to investigating, addressing and responding to the concerns of employees and to taking appropriate corrective action in response to any violation according to the Disciplinary & Grievance Procedure.

## 14 Policy Review

The Company reserves the right to amend this policy at any time. Nothing in this policy says or implies that a contract exists between the Company and its employees or that participation is a guarantee of continued employment with Nextgen Clearing Ltd.

The policy will be in place for four years following approval of a review and amendments. An earlier review can take place should exceptional circumstances arise resulting from this policy; in whole or in part, being insufficient for the purpose and/or if there are legislative changes.