

HUMAN RIGHTS POLICY

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1.0 PURPOSE

The purpose of the Human Rights Policy is to outline GDC's commitment to respect and support Human Rights of all people affected by its business. The policy sets out GDC's endeavor to engage proactively with business partners, governments, and other stakeholders to uphold the highest standards of human rights throughout the value chain.

GDC is committed to providing an environment free of human rights violations (HRV), where all individuals are treated with respect and dignity, can contribute fully, and have equal opportunities.

This Policy reflects the responsibility of GDC to respect human rights and to make sure it avoids and is not complicit in human rights abuses, as set down in the Cameroon Constitution, the Cameroon Labour Code, UN Guiding Principles on Business and Human Rights and other international standards such as the OECD Guidelines for Multinational Enterprises.

2.0 SCOPE

This policy:

- Applies at every level of GDC, and extends to all partners, employees (including full-time, part-time, temporary, probationary, casual and contract staff);
- applies to every aspect of the employment relationship, including recruitment, selection, promotion, transfers, training, salaries, benefits, discipline, and performance appraisals;
- applies to the physical offices of GDC;
- extends outside of the offices of GDC (such as off-site client meetings, business travel, firm-sanctioned social events and to electronic communications).

3.0 REFERENCES

- Law No. 96-06 of 18 January 1996 to amend the Constitution of 2 June 1974 (The Cameroon Constitution);
- Law No. 92/007 of 14 August 1992 (The Cameroon Labour Code);
- National Collective Agreement for Companies in the Exploration, Production and Refining of Hydrocarbon 2018.
- Universal Declaration of Human Rights;
- The Charter of the United Nations;
- The African Charter on Human and Peoples' Rights;



- UN Guiding Principles on Business and Human Rights;
- OECD Guidelines for Multinational Enterprises

4.0 DEFINITIONS

'GDC' means Gaz du Cameroun.

'Partners' means all GDC consultants, clients, customers, suppliers and contractors, operating partners, and investors.

5.0 PRINCIPLES

COMMITMENTS AND EXPECTATIONS

While governments bear the ultimate duty to protect human rights, GDC recognizes its responsibility to respect and support human rights in all its business operations. GDC also endeavors to find opportunities to engage and leverage its business relationships to proactively respect and support human rights.

GDC will strive to avoid complicity in human rights violations and will seek to provide for or cooperate in their remediation should any violations come to its attention. We ensure and promote channels for transparent and open communication where all internal and external stakeholders can raise concerns without fear of retaliation or reprisal and to provide fair investigation and grievance mechanisms.

GDC supports its employees and Partners in understanding Human Rights through relevant communication, dialogue, and training.

On engagement of new corporate Partners GDC request sight of their Human Rights Policies and Human Rights language may be inserted into contracts when appropriate.

We commit to human rights due diligence, an ongoing risk management process, in order to identify, prevent, mitigate, and account for how we address adverse human rights impacts as well as to identify opportunities in our business operations to support the progression of improved human rights. GDC will continuously engage with stakeholders to understand potential and actual human rights impacts.

GDC will commit to respect and support all human rights in scope of the international standards outlined above. We focus on human rights infringements that have severe negative impacts and those most relevant to our industry and business operations as identified by on-going due diligence and more in-depth Human Rights Impact Assessments (HRIA's) carried out in GDC as appropriate. Most relevant and material are; Children's Rights, Freedom of Expression, Freedom of the Media, Gender Equality, Labor Rights, Non-discrimination, and Privacy.



Moreover, there are additional areas with human rights implications, such as anti-bribery and corruption, conflict minerals, digital inclusion, environment, and sanctions.

6.0 REPORTING HUMAN RIGHTS VOILATION

GDC encourages the reporting of all incidents of HRV, regardless of who the alleged offender(s) might be.

All employees have a right to freedom from reprisals or threat of reprisals for refusing to accept harassment or discrimination in any form, for making a formal complaint or cooperating in an investigation.

6.1 How to Report Workplace Human Rights Violation

Partners or employees can report incidents or complaints of HRV. The report of the allegation(s) should include the following information:

- a) Name(s) of the person who has allegedly experienced the HRV and contact information
- b) Name of (any) alleged harasser(s), position and contact information (if known)
- c) Names of the witness(es) (if any) or other person(s) with relevant information to provide and contact information (if known)
- d) Details of what happened including date(s), frequency, and location(s) of the alleged incident(s). Any supporting documents the person who complains of HRV may have in his/her possession that are relevant to the complaint.
- e) List any documents a witness or another person may have in their possession that are relevant to the complaint.

6.2 Who to Report Human Rights Violation to

An incident or a complaint of HRV should be reported as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated in a timely manner. Complainants are encouraged to report any incidents or complaints to the Managing Director of GDC.

7.0 INVESTIGATING COMPLAINTS

7.1 Commitment to Investigate

GDC will ensure that an investigation appropriate in the circumstances is conducted when any HRV compliant is received by management from an employee or partner. Such complaints shall be



investigated in a fair, respectful, and timely manner by the Compliance Department of GDC and depending on the allegations and people involved, the investigation may be referred to an external investigator to conduct an impartial investigation.

7.2 Timing of the Investigation

The investigation must be completed in a timely manner, generally within 90 days or less, unless there are extenuating circumstances (i.e., illness, complex investigation) warranting a longer investigation.

7.3 Results of the Investigation

After an investigation is completed, the parties to a complaint may be informed in writing of the results of the investigation and any corrective action taken or will be taken by GDC.

7.4 Confidentiality

Information about complaints and incidents shall remain confidential. Information obtained about an incident or complaint of HRV, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect employees, to investigate the complaint or incident or to take corrective action or otherwise as required by law.

8.0 **REVISION HISTORY**

Rev No	Effective Date	Changes	Prepared by (name)	Reviewed by (name)
0	01.06.2018	Issued for Use	Eric Friend	Kate Baldwin
1	26.08.2021	Review and update	Henry Kalle	Kate Baldwin
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Approved by: Eric Friend (Managing Director)			Signed	5 2037
				Managing Director

