



# Human Rights Policy

November 2022



## 1. Definitions

Term	Description
Solvar or Company	Solvar Limited (ACN 117 296 143) and its' subsidiaries

## 2. Related Documentation

- Audit, Risk & Compliance Committee Charter
- Risk Management Policy
- Code of Conduct Policy
- Whistleblower Policy

## 3. Introduction & Overview

The United Nations define human rights as rights inherent to all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status.

While governments have the primary responsibility for protecting human rights, businesses have a role to play by respecting them. Through our Company Values, the Company is committed to respecting human rights in the way it does business with customers, through the people it employs and its supply chain.

The Company will conduct business in a way that respects the rights and dignity of people, and avoids complicity in human rights abuses, while complying with legal and regulatory requirements which incorporate the protection of human rights. These include:

- employment laws, covering areas such as discrimination, harassment – including sexual harassment, workplace bullying, victimisation, domestic violence and occupational health and safety; and
- consumer, customer, community, and supply chain related requirements, covering areas such as responsible products and services, accessibility requirements and adherence to the Australian Modern Slavery Act 2018.

Modern slavery is a term which covers a range of exploitative practices including human trafficking, sexual exploitation, forced labour, forced criminality, domestic servitude, child exploitation and forced organ removal.

The Company will:

- Avoid causing or contributing to adverse human rights impacts through the Company's business activities and address such impacts if they occur.
- Seek to prevent or mitigate adverse human rights impacts associated with the Company's supplier and third-party relationships that are directly linked to the Company's operation.
- Maintain grievance mechanisms to allow those adversely affected to raise concerns (as appropriate).

#### 4. Process

Design:	The Company will design and implement a risk management framework.
Assess:	Conduct due diligence on the identified risks in the Company's operations and supply chain.
Mitigate:	Adopt strategies for addressing the identified risks.
Remediate:	Develop and implement appropriate remediation measures.
Monitor & Review:	Monitor and review the effectiveness of the human rights risk management framework and processes.
Report:	Establish appropriate internal and external reporting (as required).

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## 5. Responsibility & Reporting

The Board is responsible for approving the Human Rights Policy, any associated risk management framework, and all external reporting to regulatory authorities on Human Rights or Modern Slavery in its operating jurisdictions.

The Audit, Risk & Compliance Committee (ARCCO) is responsible for overseeing the development and ongoing review of adherence to this policy. The ARCCO will ensure that any breaches in this policy are reported to the Board in a timely manner. The ARCCO will be responsible for reviewing and recommending to the Board the submission of the Modern Slavery Statement under the Australian Modern Slavery Act 2018.

Management is responsible for the development and implementation of this policy. They shall report to the ARCCO.

## 6. Application

This Policy applies to all persons working for or on behalf of, or providing services to, the Company in any capacity, including all Suppliers, Employees, Directors, Officers, Contractors, and Consultants.

The Company expects that all who have, or seek, a relationship with the Company to familiarise themselves with this Policy and to act in a way that is consistent with the Company's Values and this Policy.

## 7. Policy Requirements

### *Staff*

The Company will take actions to:

- promote a culture of respect for human rights and embrace both diversity and inclusion in the Company's workforce – with equal opportunities for all.
- facilitate the prevention of work-related risks and health hazards, including addressing occupational health and safety requirements.
- build an inclusive culture where differences are valued, including considering the rights of people with accessibility requirements and raising awareness of accessibility.
- ensure mechanisms are in place to enable its employees to raise concerns in relation to human rights impacts in the workforce and allow grievances to be addressed. This will be facilitated via the Company's Whistleblower policy.

### *Customers*

The Company will seek to contribute positively to human rights in the communities and countries in which it operates. This includes taking steps to:

- Treat all actual or potential customers fairly;
- Provide access to responsible financial services;
- Adhere to confidentiality and privacy requirements;
- Manage conflicts of interest;
- Support customers and the communities in which we operate in times of hardship; and
- Understand potential human rights risks facing vulnerable groups.

The Company will ensure mechanisms are in place to enable its Customers to raise any concerns they may have in relation to any perceived impact on their human rights and that of the Community. This will be facilitated via the Company's Whistleblower policy.

### *Suppliers*

The Company has a relatively simple supply chain consisting of the purchase of office supplies, office equipment, uniforms for staff and procurement of professional services.

The Company expects its suppliers and other persons with whom it has business relationships to respect human rights.

The Company will not knowingly engage services where it could be complicit in human rights abuses. The Company will not tolerate slavery, human trafficking, forced child labour or child exploitation. It will adhere to the requirements of the Australian Modern Slavery Act 2018.

If the Company unknowingly engages in actions directly or through the actions of suppliers or third parties that result in human rights violations, appropriate action will be taken in a timely manner. Actions may include engaging with the relevant parties to promote good practice and/or avoiding or exiting the business relationship.

The Company will ensure mechanisms are in place to enable any associated party to raise any concerns they may have in relation to any perceive impact on their human rights. This will be facilitated via the Company's Whistleblower policy.