



# GENERAL HUMAN RIGHTS POLICY

JUNE 2020

OCP GROUP



## I. PURPOSE

As a major contributor to the global fertilizer market, OCP Group supports the transition towards a more prosperous, sustainable, and resilient agriculture. The Group is vertically integrated, from phosphate rock extraction to phosphoric acid and fertilizer production, and therefore strategically positioned to deliver its mission: contribute to responsibly and sustainably feeding a growing world population. This implies respecting human rights and dignity, promoting the greatest possible environmental care, applying good labor standards and considering the governance impacts in every decision that is made.

Respecting and supporting the protection of human rights, building from our firm commitment to the International Bill of Human Rights is a strategic purpose of OCP Group as an employer, investor, partner, neighbor and fertilizer provider. Therefore, it aims to identify, assess and minimize potential adverse human rights impacts that arise from its activity, through due diligence processes and appropriate management as recommended by the UN Guiding Principles on Business and Human Rights.

This General Human Rights Policy (hereinafter “policy”) states OCP Group’s main human rights commitments. It is complemented by the operational policies listed in Section 3.2 of this Policy.

This policy is aligned with the United Nations Guiding Principles on Business and Human Rights and the 2030 Agenda for Sustainable Development. For further information regarding specific SDG contribution, please refer to each specific operational policy.

## II. SCOPE

This policy applies to all OCP Group and its affiliates’ relationships with employees, local communities and business partners (subcontractors, suppliers, joint ventures) in what they do on OCP Group’s behalf. Where OCP Group does not have full management control, it will exercise the available leverage to influence compliance with this policy. OCP Group will always comply with applicable laws, respect the rule of law, and adhere to internationally recognized human rights norms. In situations where there is a discrepancy between local legal requirements and international human rights norms, The Group will uphold its company values as defined in its Code of Conduct respecting the principles of internationally recognized human rights. OCP Group will treat the risk of causing or contributing to human rights abuses as a legal compliance issue wherever it operates. In doing so, The Group will consider all options; including refraining from new investments or terminating existing investments and activities.

This policy applies to all of OCP Group’s and its affiliates’ relationships globally. In order to ensure effective implementation, specific supporting policies related to OCP Group’s main business processes and stakeholders have been developed.

This policy is publicly available and communicated internally and externally to all personnel, business partners and other relevant parties.

## III. COMMITMENTS

### 3.1 General commitments

OCP Group is committed to:



- Respecting internationally recognized human rights in line with the UN Guiding Principles on Business and Human Rights and aligned with the United Nations “Protect, Respect and Remedy” Framework.
- Using due diligence to identify human rights risks and negative impacts, prioritizing the prevention and mitigation of those that are most severe or where delayed response would make them irremediable.
- Contribute positively to an enabling environment for human rights to be respected.
- Apply the most stringent environmental, social, and governance standards in its business processes related, but not limited to, the following areas:
  - Environment: OCP Group agrees with the Special Rapporteur on Human Rights and the Environment, that *“all human beings depend on the environment in which we live. A safe, clean, healthy and sustainable environment is integral to the full enjoyment of a wide range of human rights, including the rights to life, health, food, water and sanitation”*. At the same time, OCP Group considers the exercise of human rights such as information, participation, remedy, and freedom of expression and association, critical for the protection of a safe, clean, healthy and sustainable environment. Aware of this key interdependence and committed to the UN’s Framework Principles on Human Rights and the Environment (2018), OCP Group considers the right to a safe, clean, healthy and sustainable environment as part of the internationally recognized human rights. For more information on OCP Group’s environmental commitments, please see its General Environmental Management Policy.
  - Social: eliminate all forms of forced and compulsory labor, prevent child labor, ensure decent labor conditions and social dialogue, treat workers with dignity and respect, prevent discrimination and any form of violence in the workplace, protect health and safety, respect and adhere to rights of privacy, support the development of employees and the ecosystem, enhance diversity, inclusiveness and gender balance across the Group’s workforce.
  - Governance: adopt and promote inclusive governance integrating stakeholders’ views in business decisions; and promote ethical behaviors against corruption, fraud, anti-competitive practices, collusion, price fixing, bribery, embezzlement and money laundering among others. For more information please see OCP Group’s Code of Conduct and Anti-Bribery Policy.
- Proactively conduct assessments of potential human rights issues particularly in relation to the following groups:
  - Employees: OCP Group commits to respect the human rights of its employees by developing policies and processes with the aim of achieving uniform worldwide application. For more information on OCP Group’s commitments related to its employees, please see the General Human Capital Policy and its operational policies.



- Business partners: OCP Group commits to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint ventures and other partners through proactive due diligence, engagement, monitoring, certification and contractual provisions. Suppliers operating in, or procuring from, areas where the most severe human rights risks are identified, will be the key focus of this engagement. OCP Group proactively monitors their adherence and, where necessary, will take robust steps to ensure their compliance up to and including the termination of contracts, and communicates this to all concerned. For more detail on the principles that guide OCP Group's relation with its business partners please see its Responsible Procurement Policy and Supplier Code of Conduct.
- Local communities: OCP Group commits to respect the human rights of local communities where it operates and to develop transparent and co-operative engagement. For more information on OCP Group's engagement with local communities, please see our Community Engagement Policy.

### 3.2 Operational commitments

OCP Group's commitments to respect internationally recognized human right have been operationalized through specific policies related to our main business processes and stakeholders as follows:

- Responsible procurement policy.
- Responsible financial partnerships policy.
- Responsible marketing and sales policy.
- Responsible human resources management policy.
- Responsible local communities' relationships policy.

All the policies mentioned in section III are available at:

<https://www.ocpgroup.ma/en/sustainability/policies-and-standards>.

## IV. IMPLEMENTATION

OCP Group will implement the following lines of action aligned with the UN Guiding Principles on Business and Human Rights to ensure that the obligation of every OCP employee to respect human rights is known and complied with in their respective areas of responsibility:

- Incorporating the UN Guiding Principles on Business and Human Rights into its relevant policies.
- Integrating human rights due diligence to proactively and systematically identify, prevent, mitigate and account for potential issues in relevant business processes.
- Carrying out periodic risk identification processes regarding human rights issues affecting its stakeholders, in particular local communities where OCP Group operates.
- Engaging with relevant stakeholders in assessing and addressing impacts.



- Including human rights-related requirements within contractual arrangements with business partners.
- Collaborating or providing access to remedy through effective, legitimate, fair, accessible, predictable, equitable, rights-compatible and transparent grievance mechanisms based on engagement and dialogue.
- Assigning responsibility for addressing human rights impacts to the appropriate level and function within the business, supported by internal decision-making, budget allocations and oversight processes to enable effective responses to such impacts.
- Measuring and disclosing progress related to management actions taken to prevent and to remediate any negative impacts, based on appropriate qualitative and quantitative indicators and drawing on feedback from both internal and external sources, including affected stakeholders, as appropriate.
- Communicating how impacts are addressed in an appropriate form and frequency that is accessible to the intended audiences, provides sufficient information to evaluate the adequacy of the response and does not pose risks to affected stakeholders, personnel or to legitimate requirements of commercial confidentiality.
- Measuring and disclosing progress related to management actions taken to prevent negative impacts.
- Taking a constructive and progressive role in human rights-related multi-stakeholder initiatives.
- Conducting an evaluation, prior to any business operation, with the Business Partner to verify that the principles established by OCP Group's Human Rights Policy will be well met.

Alongside the operational policies we have developed, OCP Group has defined a progress roadmap focused on the most salient human rights identified in each business process mentioned in section 3.3.

## V. GOVERNANCE

Respect and support for human rights is of utmost concern for OCP Group's management. Executive responsibility and oversight for this policy falls within the responsibilities of the ESG / Ethics committee that reports at least twice a year to the Board of Directors / Chairman and Chief Executive Officer.

## VI. COMPLIANCE AND MONITORING

With the aim of identifying, preventing, mitigating and responding to any potential negative human rights risks or negative impacts, OCP Group will conduct an ongoing process of due diligence and risk identification in order to prevent violations and ensure respect of human rights.

OCP Group's due diligence process consists of conducting an evaluation prior to any business operation with a business partner, to verify that there are no controversies and that the



principles of human rights of the vulnerable Groups identified are well met. Specifically, this evaluation may consider:

- Analysis of the business partner's controversies.
- Commitments related to human rights included in the business operation.

OCP Group's contracts with its business partners will require that they shall respect the principles of internationally recognized human rights.

## VII. REPORTING

For more information on OCP Group's approach on human rights, how OCP Group ensures that all its operations and business partners uphold the commitment to protect human rights, and how progress is measured, please consult the OCP Group Sustainability report available on its website: <https://www.ocpgroup.ma/en/investors/annual-report>.

## VIII. REVIEW

OCP Group will periodically review this policy to evaluate its relevance, to monitor compliance and to drive continuous improvement. If and where helpful, external experts will assist in this process. OCP Group welcomes feedback and encourages dialogue with any interested party. All feedback and comments on this policy should be sent to: [sustainability@ocpgroup.ma](mailto:sustainability@ocpgroup.ma).

For consulting all the above-mentioned policies, please visit OCP Group's website <https://www.ocpgroup.ma/en/sustainability/policies-and-standards>.