



INTERNATIONAL SOS

Labour and Individual Rights Policy

Version 2.02

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POLICY

**WORLDWIDE REACH.
HUMAN TOUCH.**

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1.00	March 2009	Original Document	Group GM Compliance	Group General Counsel	March 2009	Group Managing Director	March 2009
1.01	December 2009	Minor tweaks	Group Manager Compliance	Group General Counsel	December 2009	Group General Counsel	December 2009
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1.04	March 2021	<ul style="list-style-type: none"> Expand on whistleblowing procedures (3.3.2. & 3.3.4.) Added modern slavery (3.3.12.) and child labour (3.3.14) Added Confidentiality and Data Protection (3.3.14) 	Group Manager Compliance	Group General Counsel	March 2021	Group General Counsel	March 2021
2.00	October 2022	Change the name of Policy to Labour and Individual Rights Policy	GM IAS	Group Director HR Group General Counsel	October 2022	Group Managing Director	October 2022
2.01	April 2023	Update URL to Integrity Reports	Group Manager Compliance	Chief Security Officer	April 2023	Chief Security Officer	April 2023
2.02	October 2023	<ul style="list-style-type: none"> Policy aligned to UN Guiding Principles on Business and Human Rights (1.1.6.) Added Gender Equality (3.4.3.) Unconscious Bias training (3.4.7.) ILS weekly rest (3.4.11.) Multidisciplinary online training (3.4.15.) Child labour (3.4.17.) Requirement of Suppliers to uphold standards (3.5.4.) 	Group ESG Director GM IAS ESG & Sustainability Consultant Quality & Sustainability Director	Group HR Director Senior Adviser Legal Group General Counsel	November 2023	Group Managing Director	November 2023
Responsibilities							
All employees of International SOS must comply with this Policy.							
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1. INTRODUCTION

1.1. Introduction

- 1.1.1. As part of International SOS's commitment to the highest standards of social responsibility, this document has been produced as a policy on labour and individual rights.
- 1.1.2. By providing employment, training healthcare and other benefits to our employees and by working with local service providers, International SOS directly contributes to the well-being of individuals in over 200 countries and territories and therefore contributes significantly to supporting individual rights.
- 1.1.3. We also comply with the laws of the countries in which we operate, many of which are based on individual rights principles.
- 1.1.4. This policy applies to all International SOS employees and should be read in conjunction with other policies and guidelines, in particular, the [Code of Conduct and Ethics](#), and the [Data Protection Policy](#).
- 1.1.5. International SOS pursues the protection of individual rights through our behaviour towards our employees, customers and service providers and we do not seek changes or to influence the behaviour of governments.
- 1.1.6. This policy is aligned with the **UN Guiding Principles on Business and Human Rights**, including the **Foundational Principles, Corporate Responsibility on Respecting Human Rights, having a Policy Commitment, Remediation and Access to Remedy and Non-State Based Grievance Mechanisms**.

1.2. Purpose

Employees shall be mindful of the following issues:

- 1.2.1. Our approach to communities is based on mutual respect and hence respect for the rights of all people living near our operations.
- 1.2.2. Acknowledgement of individual rights forms a central part of how we treat our employees, customers and service providers.
- 1.2.3. In particular we:
 - (a) create awareness among employees of their responsibility to treat others in the company with fairness and respect and comply with the laws, policies and procedures regarding disciplinary action;
 - (b) do not employ child labour or forced labour;
 - (c) expect our service providers to treat their employees with dignity and respect;
 - (d) comply with the labour laws in the countries in which we operate;

- (e) comply with our Health and Safety Policy;
 - (f) respect the privacy of the information provided to us by our employees, customers and service providers and comply with the laws on data protection and our Data Protection Policy; and
 - (g) comply with our Code of Conduct and Ethics Policy (the “Code”) setting out clear rules on a number of issues, including discrimination and sexual harassment.
- 1.2.4. We endeavour to ensure that our suppliers, contractors and other business partners are aware of our employment standards, including our prohibition on forced labour and child labour.

2. BACKGROUND

- 2.1. An internationally agreed definition of individual and human rights is contained in the Universal Declaration of Human Rights (the “Declaration”) provided in 1948 by the United Nations General Assembly.
- 2.2. Individual and human rights are universal values. All member countries of the UN – developed and developing – have endorsed the Declaration, a document based on wide-ranging consultation across different cultures.
- 2.3. Human rights, as defined in the Declaration, include economic, social and cultural rights, such as the right to work, to educate, to respect for culture, and to a decent standard of living.
- 2.4. Other important documents on human rights are the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the core labour standards of the International Labour Organisation (the “ILO Standards”).

3. POLICY

3.1. Politics

- 3.1.1. International SOS is not a political organization and the Code requires that employees avoid using International SOS's name and assets in connection with political campaigns and political parties.
- 3.1.2. International SOS pursues the protection of individual rights through our behaviour towards our employees, customers and service providers and we do not seek changes or to influence the behaviour of governments.

3.2. Code of Conduct and Ethics (the "Code") and complaints

- 3.2.1. International SOS encourages employees to report any breach of our Code of Conduct and Ethics, professional standards or law in good faith and in an environment free from victimisation.
- 3.2.2. The Code shall be communicated to employees effectively. Complaints can be raised using the following channels:
 - (a) You can choose to speak to someone about a suspected wrongdoing or put it in writing. Generally, your supervisor or manager will be in the best position to resolve a suspected wrongdoing, but other resources include your human resources leader or the Group Manager Compliance at Compliance@internationalsos.com.
 - (b) You can report suspected wrongdoing via Hydra, the application used for customer feedback, incident reporting and management, risk management and quality management within International SOS. Hydra – Incidents supports adverse incident reporting and incorporates automatic escalation to line management and functional management.
 - (c) You can report anonymously using the "Integrity Reporting Forms" application for non-Government Services related matters via the web at: <https://intlsos.portal.speeki.com>.
 - (d) For Government Services related suspected wrongdoings, you can report anonymously using the "EthicsPoint" application via the web at: <https://secure.ethicspoint.com/domain/media/en/gui/59418/index.html>.
- 3.2.3. Complaints shall be dealt with promptly, fairly and impartially as per our Disciplinary Action Policy.
- 3.2.4. Employees shall be made aware of the existence of these reporting channels. Employees who report any breach of our Code in good faith will not result in disciplinary action.

3.3. Communities

Understanding the perspectives of local people

- 3.3.1. An important aspect of community relations is the need to understand the impact that operations can have on the local communities. We contribute to the health and well-being of communities by bringing medical services to many of the communities in which we operate.
- 3.3.2. We shall increase awareness among our employees on the need to respect attitudes, beliefs and values. Our employees shall draw attention to any gaps or inadequacies in our policies, processes or procedures in this respect. Cross-cultural awareness is vital for our employees, so that they can fulfil their responsibilities as neighbours and co-workers.

Communications

- 3.3.3. Regular consultation and a clear channel of communication with managers for complaints about the way in which we treat people are important values to International SOS. Complaints shall be recorded and dealt with promptly and thoroughly and follow our Investigation Procedures. Interactions on such issues shall be beyond reproach, as suspicions of malpractice can easily undermine trust.

3.4. Employees

- 3.4.1. Key human rights principles are contained in the Declaration and the ILO Standards. The Declaration sets out principles on the elimination of forced labour, child labour, and discrimination. International SOS respects these principles and shall enforce them in the workplace.
- 3.4.2. We ensure deep familiarity of our employee population on health and safety, diversity, discrimination and harassment training. All employees are required to complete web-based training on employee health and safety, diversity, discrimination and harassment annually, which amongst other topics is part of the Global Compliance Course curriculum.

Gender Equality

- 3.4.3. We believe in managing a socially responsible business, where women participate on an equal basis and so, we are committed to:
- (a) Increase our number of women employees within top executive positions excluding board members, these are defined as Directors and above.
 - (b) Maintain a balanced ratio (50-50) of women employed in relation to the whole organisation.

Discrimination and harassment

- 3.4.4. The Code states that International SOS employs people without discriminating on grounds of age, ethnic or social origin, gender, sexual orientation, politics or religion.
- 3.4.5. Fulfilling this commitment is crucial to our business.
- 3.4.6. The Code also prohibits harassment in the workplace and protecting employees against sexual harassment is an important part of the Code. Employees shall be made aware of what is acceptable and unacceptable behaviour.
- 3.4.7. We aim to have all new employees complete the Unconscious Bias training within 6 months of joining the company.

Conditions of work and wages

- 3.4.8. Protecting employees and excellence in managing health and safety are essential to our long-term success. We shall comply with health and safety laws and regulations within the country in which we operate and adhere to the Health and Safety Policy.
- 3.4.9. Regardless where our employees are based, International SOS provides fair and equitable wage and benefits. We strive to attract and retain the best in our industry. Wages are reviewed annually and benefits are reviewed regularly. Processes and procedures are in place to assess and reward performance and shall be used to ensure that we remain competitive.
- 3.4.10. We shall ensure that working hours meet the market level, overtime is strictly voluntary, and we meet our legal obligations in respect of benefits. We strive to ensure a healthy and balanced work life.
- 3.4.11. As International SOS adheres to the International Labour Standard on Weekly Rest, we ensure that all our employees are provided with a minimum of a consecutive 24-hour rest period per week.
- 3.4.12. As part of our ongoing commitment to employee welfare, we offer access to Employee Assistance Programme (EAP) and internal wellness support to all of our employees globally.
- 3.4.13. All our employees have access to our [Occupational Health and Safety Policy](#).

Education, training and development

- 3.4.14. International SOS strives to improve our employees' skills and competencies by regular performance reviews, recognizing potential, undertaking education, training and coaching as appropriate, and offering professional development opportunities within International SOS. Employees need to derive job satisfaction from working for International SOS. Managers shall be encouraged to provide assistance for training and to develop the employee's present job and future careers.

- 3.4.15. All International SOS employees have access to a multidisciplinary online training platform that offers professional and personal development modules. We are committed to encourage an average of 20 training hours per employee with equity of participation for males and females.

Modern Slavery

- 3.4.16. International SOS abhors modern slavery, which is completely contrary to all we stand for. We are in the business of saving lives, and are committed to our responsibility to avoid participating, either directly or indirectly, in modern day slavery. Modern day slavery has no place in our company or in our procurement activities.

Child labour and forced or bonded labour

- 3.4.17. We take a zero-tolerance policy around child or bonded labour and will report any allegations and/or violations to relevant authorities.
- 3.4.18. We follow ILO Convention 138 to define child labour, which specifies a minimum of 15 years or the age of completion, whichever is higher.
- 3.4.19. Child labour includes different forms, including the sale, trafficking, forced or compulsory labour or the exposure to unsafe working conditions.

Confidentiality and Data Protection

- 3.4.20. Employees are required by their contracts of employment, the Code, the Data Protection Policy, the Information Security Policy and the law to respect privacy and to protect personal and confidential data. Employees shall be encouraged to understand and respect the data protection laws that affect International SOS in their location. Employees may raise complaints about data protection issues to their local Data Protection Administrator, the Compliance Department or the Group General Counsel.
- 3.4.21. The above requirements shall not preclude an employee from escalating concerns regarding the requirements of this policy in any manner. Escalations should be done in a manner which respects confidentiality requirements.
- 3.4.22. All International SOS employees and third-party personnel working for International SOS undergo mandatory web-based Global Compliance Course which includes training to strengthen their knowledge on information security and data protection.

3.5. Suppliers, Providers, contractors and other business partners

- 3.5.1. “**Suppliers**” means the third party entities with which any International SOS legal entity or personnel, contracts for the delivery or supply of services or products (e.g., Medical Supplies vendors, IT vendors, consultants, landlords, employment agencies and logistic suppliers).

- 3.5.2. **“Providers”** means the third party entities which are managed and maintained by the network services as providers of “on the ground” health and security assistance services to whom International SOS refers customers or their employees.
- 3.5.3. We expect our Suppliers, Providers, contractors and other business partners to respect the rights of their employees too. We shall ensure that our Suppliers, contractors and other business partners are aware of the standards that we expect from them. We shall continue to monitor our medical service Providers through surveys and site visits.
- 3.5.4. In adherence to our Supplier Code of Conduct and Provider Code of Conduct, we require our partners to uphold the following standards:
- (a) No use of forced or involuntary labour; all labour must be voluntary.
 - (b) Workers should maintain control over their identification documents.
 - (c) No fees or payments related to employment process.
 - (d) Timely payment to workers with clear communication on the basis of payment.
 - (e) Prohibition of punishments, mental and/or physical coercion.
 - (f) Suppliers and Providers shall not employ children under the legal age of employment in any country or local jurisdiction.
 - (g) Promotion of an inclusive work environment, discouraging discrimination.
 - (h) Adherence to health and safety standards, ensuring a safe work environment.
 - (i) Preparedness for potential disruptions, with emergency plans in place.
- 3.5.5. We encourage our partners to actively acknowledge and sign the Code of Conduct during the onboarding process. Additionally, we effectively communicate relevant International SOS Group policies, including the Code of Conduct and Ethics, Supplier Code of Conduct, Individual Rights, Safeguarding of Children and Vulnerable Adults, Modern Slavery, and Whistleblowing, through onboarding processes, contractual agreements, and/or our corporate website.
- 3.5.6. International SOS rigorously assess targeted suppliers – those significantly impacting and adding value to our operations—through financial evaluations, alignment with our Supplier Code of Conduct, and rigorous Environmental, Social, and Governance (ESG) criteria, in alignment with our Labour and Individual Rights Policy.

4. ENFORCEMENT, AUDITS AND REPORTING BREACHES

- 4.1. The conduct of each employee has an important effect on our reputation and our future. Breaches of this policy can potentially lead to disciplinary action that may include summary dismissal.
- 4.2. All employees are expected to promptly and fully report any breaches to their supervisor or the Group General Counsel. Reports made in good faith by someone who has not breached this policy will not reflect badly on that person or their career at International SOS.
- 4.3. If the supervisor, the Legal team or the employee's HR representative cannot resolve a matter or if they are part of the problem, the matter can be addressed to the following confidential email box: Compliance@internationalsos.com.



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