	Freedom of association policy	<i>Creation date:</i> 30/06/2016
		<i>Review date:</i> 05/02/2020
		<i>Communicated:</i> 28/02/2020
		<i>Version:</i> 003
		<i>Company:</i> Goldtree Ltd
		<i>Confidentiality:</i> Internal
		<i>Archiving</i> HSE Department
SUSTAINABILITY DEPARTMENT		GTPOL011

Objective: this policy is to ensure that company employees are allowed freedom of association, and that supply chain operators also allow employees freedom of association, in accordance with all applicable laws and regulations.

Definition: The International Labour Organization (ILO), an agency of the United Nations, has ratified the Freedom of Association and Protection of the Right to Organise Convention (1948) no. 87. This convention is one of eight conventions that form the core of international labour law, as interpreted by the ILO's Declaration on Fundamental Principles and Rights at Work.

This policy applies to all activities and operating locations currently run by the company as well as the future extensions or developments, and to all employees and to all contractors and sub-contractors. It is applicable to Goldtree's suppliers through all the tiers in its supply chain (see Appendix I).

Policy statement

Company's responsibility

- The company will comply with national laws that recognise the rights of workers to form and join workers' organisations and for those workers' organisations to collectively bargain and communicate with the company.
- If national laws restrict the right to organise, the company will enable the means for workers to bargain collectively and to organise.
- If national laws restrict workers' organisations, the company will establish alternative means for workers to file grievances.
- The company will not interfere with, or discriminate against, workers who choose to organise or workers who choose not to organise and recognises that workers do not need the company's authorisation to organise.
- Workers' representatives will be given access to management by appointment.
- The company understands that it has freedom to associate with, for example, employers' organisations.

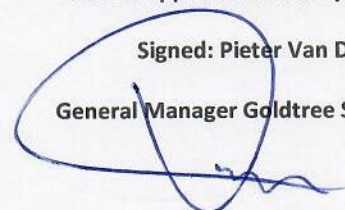
Worker organisations' responsibility


- Workers' organisations will respect the right of individuals to be members of the workers' organisation of their choice.
- Workers' organisations will respect the right of individuals not to be members of a workers' organisation.
- Workers' organisations will democratically elect their representatives in a transparent manner.
- Workers' organisations will fairly represent the members of the organisation.
- Workers' organisations will respect the right of the company to be a member of an employers' organisation.

Note: The appendixes attached to this policy are available on request in the HSE office

Date of approval: February 2020

Signed: Pieter Van Dessel
General Manager Goldtree SL Ltd



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Appendix I

Supplier Code of Conduct

Goldtree fully supports the United Nations Framework and Guiding Principles on Business and Human Rights and expects the supplier to respect all human rights, including labour rights, throughout his activities. Therefore this code of conduct is included in all contracts with suppliers.

- **Freedom of Association and Collective Bargaining**

The Supplier should grant its employees the right to Freedom of Association and Collective Bargaining in accordance with all applicable national laws and regulations.

- **Forced Labour**

The Supplier must under no circumstances use, or in any other way benefit, from forced labour in line with ILO Convention No. 29 on Forced Labour and ILO Convention No. 105 on Abolition of Forced Labour. Forced labour refers to any form of indentured servitude such as the use of physical punishment, confinement, threats of violence as a method of discipline or control such as retaining employees' identification, passports, work permits or deposits as a condition of employment. Where the Supplier is using migrant or prison labourers under a legal framework, Goldtree must be made aware to review appropriate documentation maintained by the Supplier.

- **Minimum Age for Employment**

The use of child labour by the Supplier is strictly prohibited in line with ILO Convention 138 on the Minimum Age and Convention 182 on the Elimination of the Worst Forms of Child Labour. The ILO Convention 138 on the Minimum Age indicates that no child below 15 years of age is allowed to work, subject to exceptions allowed by the ILO or national law. If the Supplier employs young family members in the agricultural supply chain, it must demonstrate that the employment of young people meets following conditions:


- It is not likely to harm their health or development
- It does not have an impact on their attendance, (i.e. is not during school hours) and ability to benefit from school, careers or training programmes
- Adequate support is provided for their educational development

- **Employment Practices**

The Supplier shall only employ workers who are legally authorised to work in their facilities and are responsible for validating employees' eligibility to work through appropriate documentation. All work shall be voluntary, and workers shall be free to leave work or terminate their employment upon reasonable notice. To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. Obligation to employees under labour and social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Appendix II

Communication. This policy, and related information, will be communicated to all employees both in writing and through routine on-the-job training sessions.

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Monitoring

General Manager will monitor compliance of this policy through HR Manager. All complaints and grievances relating to freedom of association will be dealt with seriously, promptly and confidentially. Every effort will be made to ensure that employees who make complaints or have grievances related to freedom of association will not be victimised. Victimisation of those raising complaints or having grievances related to freedom of association will result in disciplinary action and may warrant dismissal.

Documentation

HR Manager will report on a monthly basis (as part of the HR Manager’s monthly report) on all grievances and complaints relating to freedom of association and the stage each one is at in the resolution process. General Manager will report on a monthly basis (as part of the General Manager’s monthly report) on all significant grievances and complaints relating to freedom of association and the stage each one is at in the resolution process.

Review. This policy will be reviewed annually and revised as necessary

