

# HUMAN RIGHTS AND LABOUR POLICY

The Two Lakes Group  
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## Table of Contents

1.1	Introduction.....	2
1.2	Position.....	2
1.3	Workplace Safety and Equality.....	2
1.4	Diversity and Inclusion .....	2
1.5	Rights of Children .....	3
1.6	Supporting Local Communities.....	3

## 1.1 Introduction

As a company active in emerging economic regions, the Two Lakes Group (“Two Lakes” or the “Company”) acknowledges its role and responsibility to ensure respect for human rights in all its operations cross the world.

Respecting human and labour rights is integral to the Company’s mission to connect local ambitions with global opportunities. We maintain this Human Rights and Labour Policy (the “Policy”) with the intention to inspire similar commitments by others.

## 1.2 Position

In addition to complying with local laws and statutory requirements in individual countries where we operate, Two Lakes has embedded its commitment to human rights in its Code of Conduct and its Anti-Corruption and Bribery Policy.

In addition to Company Employees, employees, officers and directors of the Company’s representatives, vendors, contractors, shippers, agents, customers, suppliers, consultants, business contacts, advisers, brokers, including authorized travel agents and general sales agents, and any other entity that performs services for or on behalf of the Company or any of its subsidiaries or their employees, wherever located (collectively, “Associated Persons”) are expected to have and comply with their own human rights and labour policies or comply with this Policy.

## 1.3 Workplace Safety and Equality

Two Lakes believes in maintaining a safe and healthy work environment and to treating all employees with dignity and fairness. We will not tolerate any form of harassment or discrimination in the workplace.

Two Lakes provides equal employment opportunities based on merit and performance without regard to the employee’s race, colour, religion, sex, age, national origin, sexual orientation, disability, citizenship status, or marital status.

Two Lakes is committed to strictly comply with all applicable laws on compensation, including the minimum wage. In regions where salaries are significantly lower than those in North America, Two Lakes will make every effort to offer “fair and meaningful compensation” rather than the locally accepted minimum.

## 1.4 Diversity and Inclusion

Two Lakes values diversity of thought and background. We believe that inclusion and collaboration between different people with different backgrounds, experiences, expertise offers unique value to our business. We strive to promote diversity and inclusiveness at all levels in the organization, and we are focused on providing an enabling environment that allows every individual to reach their full potential.

## 1.5 Rights of Children

As traders and brokers of commodities, Two Lakes regularly enters into partnerships with farms, mines, refineries, and other suppliers around the world. We make every effort to avoid partners that knowingly employ and exploit children and participate in local initiatives such as the Tujenge Foundation in Burundi that offer low-cost schooling options as an alternative to physical labour.

## 1.6 Supporting Local Communities

Two Lakes maintains open and regular dialogue with local communities in the regions where we operate. Each solution that we design is intended to make tangible differences on the ground to improve livelihoods, eliminate illegal and unacceptable labour practices, and deliver better living standards for farmers and rural communities. We respect customary and legal tenure, and access rights of indigenous people, as well as local and cultural traditions.

In all circumstances, Two Lakes insists its partners to make every effort to hire local employees before planning to import staff from overseas.