CORPORATE POLICY

# Human Rights, Labour and Workforce Policy

| EFFECTIVE DATE | VERSION | NEXT REVIEW |
|---|---|---|
| 11 August 2026 | 1.0 | 12 months after approval |

| POLICY OWNER | APPROVED BY |
|---|---|
| Managing Director (operated by HR) | Board of Directors, [date] |

APPLIES TO

All Boafo Nsa workers, including casual and daily-rated workers, and workers of subcontractors and labour providers

## 01 Policy statement

Boafo Nsa respects the human rights of its workers and of the communities where it builds. Construction relies heavily on casual and subcontracted labour, where abuses are most common, so these protections apply to every person working on our sites, whoever pays them.

## 02 Framework

- Constitution of Ghana, 1992, and the Labour Act, 2003 (Act 651)
- National Pensions Act, 2008 (Act 766) and SSNIT contributions
- Children's Act, 1998 (Act 560) and Human Trafficking Act, 2005 (Act 694)
- ILO core conventions on forced labour, child labour, freedom of association, collective bargaining, equal pay and non-discrimination
- UN Guiding Principles on Business and Human Rights, and IFC Performance Standard 2 where lenders require it

## 03 Our standards

01 **No child labour.** No one under 18 works on our construction sites, which are hazardous work under Ghanaian law. Age is checked using a Ghana Card or other ID at hiring.

02 **No forced labour.** No withholding of ID documents, wages or deposits; no debt bondage; workers are free to resign with legal notice.

03 **Written terms.** Every worker, including casual workers, receives written terms in a language they understand, stating pay rate, hours and job.

04 **Fair pay.** At least the national daily minimum wage, paid on time and in full, with a payslip; overtime paid as required by law or agreement; no unlawful deductions.

05 **Social security.** SSNIT and pension contributions paid for all eligible workers.

06 **Working hours.** Normal hours and overtime within legal limits; at least one rest day a week.

07 **Freedom of association.** Workers may join a union and bargain collectively without retaliation.

08 **Non-discrimination.** No discrimination in hiring, pay or treatment on grounds of gender, ethnicity, religion, disability, HIV status, pregnancy or union membership. Women are actively encouraged into site roles.

09 **Safe accommodation.** Where we provide worker camps, they meet minimum standards for space, ventilation, water, sanitation, security and separate facilities for women.

10 **Local employment.** Unskilled jobs are offered first to people from the project area, recruited transparently, with no fees charged to workers.

## 04 Worker grievance mechanism

Workers can raise grievances about pay, treatment or conditions with their supervisor, the site HR officer or anonymously through the channels in BN-POL-04. Grievances are logged, answered within [10] working days and never lead to retaliation.

## 05 Labour providers and subcontractors

Subcontractors and labour agencies must meet these standards. Boafo Nsa checks headcounts, payment records and SSNIT compliance, and may pay workers directly and deduct the cost if a subcontractor fails to pay wages.

## 06 Security

Security guards on our sites are trained on the respectful treatment of workers and the public, carry no firearms unless authorised by law and the Managing Director, and must not use force except in self-defence.

## 07 Review

HR reports annually on headcount, wage compliance, grievances and audits of subcontractors. This policy is reviewed at least every 12 months.

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