



# CMS Human Rights Policy

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## 1. Policy Statement

We make choices and decisions, on where we operate, what we do and how we do it, all the time that affect people. We understand that we can make mistakes, but our code of conduct and human rights policy requires us to do our utmost to excel in things we do and do them in the right and transparent way.

Caspian Marine Services B.V. (CMS) is committed to upholding and promoting human rights in all aspects of its operations. We recognize that every individual is entitled to certain fundamental rights and freedoms, regardless of their race, color, religion, gender, sexual orientation, nationality, disability, or any other characteristic. This includes a strong stance against modern slavery and human trafficking in any form. We are dedicated to preventing modern slavery and human trafficking within our organization and supply chain. We recognize that these practices are abhorrent violations of human rights and are committed to taking proactive measures to identify, prevent, and eliminate any instances.

This Human Rights Policy outlines our commitment to respecting human rights and provides guidelines for our employees, stakeholders, and business partners.

## 2. Compliance with Laws and Standards

We will comply with all applicable national and international laws, regulations, and standards related to human rights. This includes but is not limited to:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- Convention on the Elimination of All Forms of Discrimination Against Women
- Convention on the Rights of the Child
- International Labour Organization's Fundamental Conventions
- Labor Code of Azerbaijan Republic.

## 3. Responsibilities

### a. Senior Management

Senior management is responsible for ensuring the integration of human rights considerations and anti-slavery measures into our business strategies, decisions, and practices.

***b. Employees***

All employees are expected to adhere to this policy, understand its implications, and report any concerns related to human rights violations, modern slavery, and human trafficking.

**4. Principles of Human Rights**

Our commitment to human rights is guided by the following principles:

**Terms:** Workers have clear, written employment terms before deployment in a language they understand, and in line with terms at point of recruitment, which are consistently upheld. These contracts as a minimum contain the following elements: employer, nature of work, expected regular working hours, including overtime hours, rates of pay, lawful wage deductions, pay cycle, benefits, including overtime, leave entitlement and rest days, provisions for repatriation.

**Legal status:** Workers are legally authorized to work for their employer and possess the necessary visas, work permits, and any similar legal documentary requirements.

**Protection of Young Persons:** Workers below 15 or the legal minimum working age (whichever is higher) are not hired, either directly or indirectly.

**Fees:** Employers are responsible for all costs and fees associated with recruitment of workers regardless of the manner or location of the imposition or collection of the fee. Workers do not pay recruitment or other fees irrespective of the method of payment or by whom it was collected. Fees include: payments in connection with recruitment, termination, placement, visas or work permits, government levies, medical examinations, airfare or costs of other mode of international transportation, security deposits and bond, transportation from the airport or disembarkation point to dormitories or facility (where applicable). Workers do not suffer unlawful pay deductions, to secure a job or for continued service, nor disproportionate monetary penalties as a disciplinary measure.

**Passports and papers:** Worker passports, travel identification or work authorization papers are not withheld. Workers may choose to lodge their passports or other papers with employers if they genuinely consent to doing so and can freely access them upon request without penalty or delay.

**Free movement:** Workers are free to terminate employment upon reasonable notice without penalty. Workers are not prevented from leaving worksites or employment, except for reasonable safety or security reasons.

**Pay:** Workers are paid on time, as per employment terms. Salaries, benefits and overtime rates meet, as a minimum, national legal standards. Salaries paid and hours

worked are accurately recorded through a time keeping system. Each employee receives Payroll payslip form related to his/her salary electronically to his/her respective email address.

**Working time and rest:** Workers are not required to work unreasonable hours, hours beyond legal limits, or without appropriate breaks and defined leave periods.

**Grievance:** A grievance process is in place by which workers can make complaints, including anonymously, and receive appropriate responses and timely updates on the status of concerns. Concerns may be raised through any process (formal or informal) without fear of retaliation, discrimination or harassment as described in CMS Whistleblowing Policy.

**Working conditions and accommodation:** Workers enjoy a safe and hygienic working environment. Access to clean toilet facilities, potable water, and if appropriate, sanitary facilities for food storage are provided. Accommodation and food, where provided, is clean, safe and meets the basic needs of the workers.

**Discrimination and harassment:** There is no discrimination in employment practices based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation or any other characteristic prohibited by law. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are not tolerated.

**Freedom of Association:** In conformance with local law, where workers choose to be represented by trade unions or works councils, employers will cooperate in good faith with the bodies that the employees collectively choose to represent them.

**Health and Safety:** We will maintain a safe and healthy work environment for all employees, visitors, and stakeholders. We will implement appropriate measures to prevent accidents, injuries, and occupational health hazards. Employees will receive adequate training and resources to ensure their safety and well-being.

**Privacy and Data Protection:** We will handle personal data in accordance with applicable privacy laws and regulations. We will obtain consent when required, and personal information will be securely stored and protected. Individuals will have the right to access and correct their personal data held by the organization.

## 5. Human Rights Due Diligence

We will conduct ongoing human rights due diligence to identify, prevent, mitigate, and address any adverse human rights impacts associated with our operations. This includes assessing risks, engaging with stakeholders, and taking appropriate actions to address any identified issues.

## 6. Reporting and Accountability

We will establish mechanisms for employees and stakeholders to report any human rights concerns or violations in accordance with CMS Whistleblowing Policy. We will investigate all reported incidents promptly and take appropriate actions. Regular monitoring, reporting, and reviewing of our human rights performance will be conducted to ensure continuous improvement.

## 7. Communication and Training

We will communicate this Human Rights Policy to all employees, stakeholders, and business partners, making it readily accessible and understandable. We will provide training and awareness programs to ensure that everyone understands their rights and responsibilities regarding human rights.

## 8. Compliance

Failure to comply with this policy may result in disciplinary actions, including termination of contracts or employment, as appropriate.

## 9. Conclusion

By implementing this policy, we aim to contribute to the eradication of modern slavery and human trafficking globally. We are committed to working collaboratively with our employees, partners, and stakeholders to achieve this goal.

## 10. Revision Summary

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01	DCR 061-23	03 August 2023