



GOLD COAST REFINERY LIMITED

HUMAN RIGHTS DUE DILIGENCE PROCEDURE

Doc No.: GCR/COM/POL/06
Issue No.: 01
Amend No: 00
Distribution: Public

Document Versions Control

Version reference	Date of revision	Revised by	Changes summary
0.1		Compliance Manager	Document created

Document control

Document owner: Clement Nyadroh Compliance Manager	Managed by: Clement Nyadroh Compliance Manager	Approved by: Mr. Emad Deraz Executive Director	Date approved: 16.02.2022
Security classification: Public	Next review date: Legislative/business changes or 2 years.	Version: 1	Department: Compliance

Table of Contents

I – OUR COMMITMENT.....	5
II - KEY TERMS	5
III HUMAN RIGHTS DUE DILIGENCE PROCESS.....	6
1.1 ASSESSMENT & IDENTIFICATION OF SALIENT RISKS	6
1.2 Data Collection:.....	6
1.3 Identify significant business relationships:.....	6
1.4 Reasonably review all your business relationships.....	7
1.5 Engage with potentially affected stakeholders/rightsholders:	7
2.0 ACTION PLAN TO INTEGRATE PRIORITY ISSUES, PREVENT, RESPOND AND REMEDY IDENTIFIED IMPACTS	7
3.0 ON-GOING MONITORING AND ACTION TRACKING	8
4.0 COMMUNICATION	8
APPENDIX I LIST OF RESOURCES	9

I – OUR COMMITMENT

GCR is committed to conducting business in an ethical and responsible manner. We, recognise our responsibility to respect human rights. We believe that our business has a role to play in protecting and promoting human rights.

The GCR Human Rights Policy sets out overarching principles for how we conduct business at GCR. Together with our employees and business partners, we are committed to drive forward the implementation of this Policy throughout our operations and supply chains. We recognise unique challenges may arise and we will work to address these challenges in collaboration with relevant partners and stakeholders.

This Policy is guided by international principles including those encompassed in the United Nations Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work.

This HRDD procedure sets out how we carry DD through a set of management systems that enables GCR to identify, prevent, mitigate, and account for adverse human rights impacts and risks that are connected to its business activities and business relationships.

GCR uses its best endeavours, to leverage, to influence, to promote responsible business practices among our significant business partners.

GCR has set up a Grievance Mechanism for anyone to ask a question, report a concern or a violation of the CGR Code or policies including the Human Rights Policy. The mechanism is accessible to any individuals or groups whose rights could be negatively impacted by the company. For example, employees, contract workers, workers in the supply chain, artisanal miners and their families, members of the community around a business facility or site, consumers or end-users. (see Grievance Procedure and www.gcr-ltd.com).

II - KEY TERMS

Human rights refer to a set of basic rights and freedoms that belong to every person in the world, regardless of where they are from, what they believe or how they choose to live their life. It is a broad concept, with economic, social, cultural, political, and civil dimensions.

Salient human rights issues: Human rights that stand out because they are at risk of the most severe negative impact, through the company’s activities or business relationships. The concept of saliency focuses on impacts that are most severe (in scale and scope), potential (likely to have occurred or be occurring in the future), negative (causing harm) and human rights focused (by posing a risk to people).

Potentially affected stakeholders: Also referred to as rightsholders, these are individuals or communities directly or indirectly impacted by business activities, or by individual or organisations acting on their behalf. In line with the UNGPs, human rights assessment should take adequate account of the perspectives of these stakeholder groups or their legitimate representatives.

Leverage: The ability of a business enterprise to effect change in the wrongful practices of another party that is causing or contributing to an adverse human rights impact.

Credible proxies: Referred to in the UNGPs as individuals or groups who work with affected stakeholders and have direct insights into their perspectives (e.g. local organisations, NGOs, local consultants, or trade unions) that do not represent the workers in question, but have good insight into local human rights risks and systemic issues.

III HUMAN RIGHTS DUE DILIGENCE PROCESS

1.1 ASSESSMENT & IDENTIFICATION OF SALIENT RISKS

Carrying out human rights due diligence starts with understanding how GCR's activities and business relationships may pose risks to human rights – that is, risks to people – and identifying areas where the risk of adverse impacts is most significant.

1.2 Data Collection:

The first step is to map the supply chain (Tier 1 and beyond as much as possible), based on the information collected through KYC and DD from existing suppliers and from new supplier or partners prior to starting a business relationship. The information should be regularly updated.

In addition, we look for evidence of HRDD carried out:

- Overview of processes and procedures to manage human rights risks or impacts
- on site (e.g. H&S, working hours, discrimination, etc.)
- Risk assessment documentation for owned units and, if any, sub-contracted units
- Evidence of social compliance audits carried out for owned units and, if any, subcontracted units
- Evidence of Corrective Action Plans (CAPs) issued for owned units and, if any, subcontracted units
- Evidence of supplier participation in relevant industry programmes and initiatives.

1.3 Identify significant business relationships:

These are major customers or suppliers. They have a key role to play in supporting our commitment to human rights. GCR may also be likely to have influence or leverage over them.

Look out for risks specific to our sourcing regions and industry context

- Have you identified specific human rights that are recognised as being most at risk in a particular country context?
- Have you identified specific human rights that are recognised as being most at risk in a particular region within the country?
- Have you identified specific human rights that are recognised as being most at risk in your industry context?
- Consult the resources country indices in Appendix 1 to inform your research on human rights risks

1.4 Reasonably review all your business relationships

Identify where the greatest risk areas across our business relationships are and ensure full due diligence regarding these risks.

Establish the level and nature of risks in relation to all our significant business relationships.

Engage relevant internal stakeholders, identify which business functions may regularly encounter human rights impacts and risks (e.g., security, human resources, procurement, Sourcing, Quality, HSE or Compliance etc).

1.5 Engage with potentially affected stakeholders/rightsholders:

Individuals working in our supply chain are likely to be impacted by our activities in one way or another, so this group is a good starting point.

- Allocate sufficient resources to research stakeholder groups and develop an engagement approach
- Identify group representatives with whom you can engage and overcome barriers (e.g., language, culture, vulnerability, level of literacy, level of trust, etc.)
- Consider potential third-parties (e.g., auditor) who can support with identifying and reaching relevant representatives
- Identify how to engage with stakeholder representatives

If you haven't been able to engage potentially affected stakeholders/ rightsholders, have you considered engaging with credible proxies?

- Have you identified credible proxies to engage?
- Are you able to allocate sufficient resource to research relevant credible proxies to engage?

Establish a focused set of issues to prioritise action on. Start the HRDD in a targeted way, prioritising particular countries or parts of the business, to build learning about how to assess and prioritise risks, and, over time, expand the scope to cover the company's entire operations and supply chain.

Record the risks in risk register to support in prioritising the risks.

2.0 ACTION PLAN TO INTEGRATE PRIORITY ISSUES, PREVENT, RESPOND AND REMEDY IDENTIFIED IMPACTS

Building the action plan by identifying the actions you think our company should take against each of its prioritised issues together with the people who are:

- Responsible – the person/people who do the work to complete the action
- Accountable – the person/people who will approve the action taken
- Consulted – the person/people who need to be engaged in the conversations that lead to the completion of the actions (e.g. subject matter experts)
- Informed – the person/people who need to be kept up-to-date on the progress of the action

Identify opportunities for leverage specific business partners who are related to risks or impacts.

Questions include:

Do we have direct influence over the entity?

How much business does our company represent for the entity?

What do the terms of the contract with the entity include? Does any term specify conditions in regard to our human rights policy commitment?

Could we incentivise the entity to improve human rights performance in terms of future business? Reputational advantage? Assistance with building their capabilities?

Does working with this entity benefit their reputation? Would ending the relationship negatively impact their reputation? Could we incentivize other enterprises or organizations working with this entity, including business associations and multistakeholder initiatives, to improve their human rights performance?

Could we engage local or central government in requiring improved human rights performance by the entity through the implementation of regulations, monitoring, sanctions, or anything else?

We will complete a corrective action plan if needed, to establish next steps, prioritise the steps and earmark those that will need consideration at a later point (e.g., 6, 12 or 18 months).

We will ensure that someone is assigned to each of our next steps and that a timeframe is decided, with regular touch points to track progress and discuss any challenges.

There will be regular communication to the Executive Management.

3.0 ON-GOING MONITORING AND ACTION TRACKING

Regularly monitoring our performance in preventing and mitigating adverse human rights impacts helps us understand if our actions are achieving the desired result and allows us to adapt processes and procedures if they do not.

Our company's response to risks and impacts may be measured by looking at:

- Inputs and outputs – The financial, human and material resources used for an action, what is being produced and how it is being used. This also includes processes our company has in place to carry out HRDD-
- Incidents – The results of monitoring instances of negative impacts (e.g. safety violations).
- Outcomes – The action's effects at the target-group level.
- Impacts – The action's effects at a broader, societal level.

We will try to measure both quantitative and qualitative aspects of our interventions.

4.0 COMMUNICATION

GCR communicates its actions to stakeholders by publishing a report on its website. However, stakeholders' preferences and ability to access information may differ, for example if they lack Internet access or are not used to formal company documents in English.

It is hence important to consider different ways of conveying information and identify the most adequate channels and language to reach the relevant stakeholder groups.

16 February 2022, Ver 0.1

Signed

.....

Executive Director

APPENDIX I LIST OF RESOURCES

Internal data can also be a good starting point to identify risks, such as sourcing countries, commodity lists, audit results, supplier self-assessment or risk assessment, employee survey and statistics, incidents, etc. Suggested next steps: Identify relevant stakeholders and organise one-to-one or group interviews. Explore existing databases, data points available, and discuss with relevant colleagues the salient human rights issues (or “red flags”) you identify.

Desk research

Reports from companies, NGOs, government bodies or media can be very useful sources of information to help you gain insights into your operating/sourcing country contexts.

Search your peers and competitors by searching the company name + “CSR report”/“Sustainability report”/“Human rights”/“Ethical Code of Conduct”. Search reports by searching sector name + “country” + key terms such as “human rights”/ “environmental issues”/“labour rights” + “report”.

External experts

NGOs, international organisations or academics can be worth engaging with to gain expert insights into a specific country or issue. Search your sector name + “NGOs” or “academic” or “organisation” + “country” + key terms mentioned previously.

Country indices

Indices and country reports are another great way of learning about a country context and gaining awareness of your operating/sourcing countries’ state of affairs.

Research salient human rights issues in your operating and sourcing countries using the following sources of information.

Human Rights Watch Country Reports

Browse countries of interest to get an overview of human rights most at risks based on recent events Country Reports on Human Practices. The U.S. Department of State publishes annually detailed reports on all countries’ human rights practices. Rule of Law Index Provides indication of how the rule of law is experienced and perceived. Compare countries and dive into specific country insights. Freedom House Evaluates people’s access to political rights and civil liberties. Children Rights in the Workplace. Explore country-by-country data on children rights in the workplace. ITUC Survey Find information on violations of workers’ rights in specific countries. Global Slavery Index Explore modern slavery risk and prevalence country by country.