



Doc ID: BRN_POL_06_Labor and Working Conditions	Issue Date: February 2014	Revision Date: January 2018	Status: Active
---	-------------------------------------	---------------------------------------	--------------------------

Labor and Working Conditions

Brazilian Nickel Group is committed to providing a safe and healthy working environment where its employees are treated fairly, with respect and can realize their potential. To this end, the Directors and Executive Management of BRN consider that their primary responsibilities in all areas of Group operations are:

- To establish and maintain positive worker-management relationships and continually seek to improve these.
- To promote the fair treatment, non-discrimination and equal opportunity of workers, and comply with the national labor and employment laws of Brazil.
- To have the right people with the right capabilities in the right jobs at the right time.
- To ensure that child labor or forced labor is never used.

In order to implement these responsibilities, the following will be ensured:

- Working conditions and terms of employment that comply with national law and with other relevant BRN standards & codes.
- Improvement of employee skills and knowledge through appropriate training programmes.
- A human resources management system implemented at each project which states the approach to managing employees and which clearly explains to employees their statutory rights, including those to wages and benefits.
- Equal opportunities for employment, compensation, instruction, advancement, termination & retirement and the implementation of policies and practices designed to eliminate harassment and discrimination on any ground including but not limited to race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age.
- Constructive engagement with employees on matters of mutual concern including through the establishment of an effective and transparent employee grievance mechanism.
- Recognition of the right of workers to join trade unions (or similar organisations) and to freely associate, organize and bargain collectively, and engagement with worker's representatives regarding matters of mutual concern.
- Prohibition of the use of forced labor at its places of operation consisting of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty.

The Board of Directors and the Executive Management expect all line managers and supervisors to act at all times in full compliance with these policies and to exercise effective leadership through their personal example and attitude.

We also expect the full and enthusiastic participation in and co-operation and compliance with these policies and principles from all our employees and will seek to ensure that contractors and suppliers meet similar standards.

Prepared by: Mike Oxley, Managing Director	Reviewed by: Anne Oxley, Technical Director	Approved by: Paul Lush, Chairman
--	---	--