

Agility's Human Rights Policy

Agility is committed to maintaining a culture that supports the internationally recognized human rights outlined explicitly in our human rights policies, human resource management and general business practices.

We recognize and support the principles of the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Labour Organization Fundamental Conventions on labor standards. Our Agility Code of Business Ethics and Conduct is supported by a corporate compliance program that includes robust policies and internal controls, and which is reinforced by a comprehensive training and management program.

We identify, assess and manage human rights according to principles that govern the following groups:

- **Employees**

We respect the human rights of our employees, practice non-discrimination, support freedom of association, ensure fair wages and working hours, and keep the workplace free of harassment. We have zero tolerance for child labor, forced labor, human trafficking or modern slavery anywhere in our supply chain. Regular employee training ensures that Agility's human rights policies are being observed across our operations.

- **Suppliers and Contractors**

We evaluate and monitor our major labor suppliers and contractors against our human rights policies. We do not condone the offering, payment or acceptance of bribes.

- **Communities**

We respect the cultures, customs and values of the people in communities in which we operate. We contribute to the fulfilment of human rights through the economic, environmental and social impacts of our business. We encourage open dialogue with stakeholders and participate in community development activities.

- **Society At Large**

We uphold internationally recognized human rights, promote environmentally sustainable development in our core business activities, and uphold the highest standards in business ethics and integrity. We do this through participation in multi-stakeholder initiatives, community engagement, and support of national and international authorities to establish and enforce high standards.

- **Measurement, Analysis and Continuous Improvement**

We conduct regular reviews to assess our human rights performance and take appropriate measures to address real or perceived gaps in our business practices.

Agility's Human Rights Framework: Explaining our Approach

Agility is committed to maintaining a culture that promotes human rights in our relationships with our employees, suppliers, communities, and other stakeholders.

What do we mean exactly?

Forced Labor, Human Trafficking and Modern Slavery

Agility prohibits the use of involuntary, forced, or bonded labor; including human trafficking of any kind, modern slavery, prison labor, or labor demanded of employees because of their debt.

- Agility promotes ethical recruitment practices and will not tolerate labor agencies charging prospective employees recruitment “fees” or recruitment “costs”.
- Agility will not unlawfully withhold employees’ passport or government IDs. If it is legal or regulatory requirement to retain original documents, workers must give informed, written consent and be able to retrieve their documents within 24 hours of a written request.
- Agility will not unreasonably restrict employees’ movements; employees are free to leave at the end of their shifts and free to refuse to work overtime.
- Employees are free to leave Agility’s employment without financial penalty, after observing the notice period and/or any other provisions set forth in their employment contract and applicable local labor law.

Child Labor

Agility has a zero tolerance policy for child labor. We adhere to the minimum age provisions in applicable laws and regulations where we conduct business. Young persons under the age of 18 should not be employed at night or in hazardous conditions.

Work Hours and Wages

Agility strives to compensate employees fairly relative to the industry and local labor market. We are committed to complying with minimum or living wage requirements, work hours, overtime and benefits set forth under applicable local laws.

Health, Safety and Environment

Agility is committed to promoting environmentally-friendly operations, and maintaining a safe, healthy, and productive workplace, which minimizes the risk of preventable accidents, injury and exposure to health risk. Accommodations, when provided, must meet the basic needs of employees and be clean, safe, and secure.

Freedom of Association

Agility takes an open attitude towards collective bargaining, where permitted by law, and will not hinder the development of means for independent and free association.

Discrimination and Harassment

Agility is an equal opportunity employer and does not discriminate on the basis of race, color, religion, gender, age, nationality, sexual preference, disability, or any other factors prohibited by applicable laws. Agility is committed to providing a work environment that is free from all types of harassment, including verbal, physical, visual, psychological, and sexual harassment.

Community and Stakeholder Engagement

Agility respects the cultures, customs and values of the people in the communities in which we operate, and strives to contribute to the fulfillment of human rights through the economic and social impact of our business. We encourage open dialogue with stakeholders and participate in community development activities.

Whom does this apply to?

Entities

This policy applies to Agility group companies and entities we hold a majority interest in.

Contract Workers

Agility expects that all employees who work for Agility, whether hired directly or through a third party, will be treated in accordance with our human rights policy.

Suppliers

Agility expects all suppliers and contractors to uphold our policies, and encourages the adoption of similar policies. Agility evaluates and monitors labor suppliers against our human rights policies and our Code of Business Ethics and Conduct.

How do we uphold our human rights policy?

Oversight & Accountability

This policy is aligned with the Agility Code of Business Ethics and Conduct, which is overseen by Agility's Board of Directors and the Group CEO. Agility's global, regional, and country business units and human resource leaders are accountable for ensuring our organizations and personnel comply with our human rights and ethics policies.

Measurement, Analysis and Continuous Improvement

Agility conducts regular reviews to assess our human rights performance and take appropriate measures to address real or perceived gaps in our business practices. We monitor relevant regulations, standards, principles and trends to ensure our Fair Labor program meets the high ethical standards to which we commit ourselves and against which we must perform.

Employee Awareness

Agility ensures awareness of our human rights policies through regular communication and trainings with employees.

Violation Reporting

Employees are encouraged to report concerns or violations to local management, Human Resources, or the Ethics and Compliance team. Agility also offers confidential grievance reporting in multiple languages through a hotline and website, run by an independent third-party.

Protection for Complainants

Agility does not tolerate discrimination or retaliation against any employee who has raised or reported an ethics concern in good faith.

Consequences for Violations

Actions will be taken against employees, contractors, subcontractors or agents for violations of our human rights policy. Such actions may include disciplinary action, financial penalties, suspension or termination of employment or contract, and prosecutorial referral.

Public Reporting

Agility reports to the public on its human rights commitments as part of its bi-annual sustainability reporting framework. We regularly and timely report information about our Fair Labor program as required by regulations wherever we operate.

What global standards inform this approach?

We recognize and support the principles of the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Labor Organization Fundamental Conventions on labor standards. Agility's fair labor program sets a high corporate standard for human rights, in line with the requirements of the UK Modern Slavery Act, the US Federal Acquisition Regulation, and the Ethical Trading Initiative Base Code.

Agility Modern Slavery Statement

Agility's Global Human Rights Policy states our commitment to maintaining our operations and supply chains free of modern slavery and child labor. Our Human Rights Policy Framework explicitly notes that "Agility prohibits the use of involuntary, forced or bonded labor, including human trafficking of any kind, modern slavery, prison labor, or labor demanded of employees because of a debt", and that Agility has "zero tolerance for child labor."

Agility is a global integrated logistics provider operating in more than 100 countries and the largest private owner and developer of industrial real estate in the Middle East and North Africa. Agility Global Integrated Logistics, accounting for about 80% of the business, works with companies to move, manage and distribute customer cargo, offering air, ocean and road freight forwarding, warehousing, distribution, and specialized services in project logistics, fairs and events, and chemicals logistics. Trading under their own brand names, other entities in the Agility portfolio build trade infrastructure in emerging markets, offer fuel logistics, airport and ground-handling services, commercial real estate development, remote camp services, and customs modernization.

Assessing Modern Slavery Risk

In our business, the recruitment of foreign manpower for our operations in the Middle East and select countries in Asia is the critical driver of modern slavery risk. At the country level, our operations conduct an annual self-assessment that identifies risks of non-conformities with international standards for fair labor and human rights in the workplace. Agility matches this with external and operational factors to assess overall risk.

Actions to Prevent Modern Slavery

Our Global Human Rights Policy is underpinned by our Fair Labor program, including training, resources, and procedures to enable our operations to successfully comply. It includes:

- Live, video and remote training programs for managers and human resources staff on our policies and how to implement them in practice.
- Multi-language human rights training integrated into operations (video and live training) to ensure all employees, even those hired by a third party, are aware of their rights and how to make a report through confidential and anonymous grievance reporting channels.
- A human rights declaration for manpower provider contracts that prohibits modern slavery. This language expressly states the consequences of non-compliance with our policies, including the forfeiting of a bond (in relevant markets) and being blacklisted by Agility.
- A requirement for all foreign recruited employees to sign a declaration that they have not paid requirement fees, both pre- and post-hiring.
- Voluntary third party human rights audits in some critical markets, internal audits and customer audits where requested.

Agility tracks and publicly communicates its progress implementing the Fair Labor program through its Sustainability reports and its sustainability microsite.

For our supply chain, Agility uses a questionnaire to assess suppliers in some markets for their compliance with local regulations regarding human rights, as well as our own corporate policy. Agility does not work with suppliers that are not taking sufficient steps to prohibit modern slavery in their own operations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and the Australia Modern Slavery Act 2018. As with our Human Rights Policy, it covers all Agility group companies internationally, including but not limited to, the following entities:

Agility Logistics Holdings Limited
Agility Management Limited
Agility Logistics Limited
Agility Project Logistics Limited
Agility DGS UK Ltd
Agility Chemicals Ltd

This statement constitutes our corporate modern slavery and human trafficking statement for the financial year ending 31st December 2018 and remains in force until superseded.