

CASTLEPOINT

Human Rights Policy

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HUMAN RIGHTS POLICY

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Overview

Human rights are the basic, inalienable rights of all people, regardless of their background or circumstances, to live with dignity, be treated equally, and be respected. The UN Universal Declaration of Human Rights sets out the basic rights and freedoms of all people.

In our company, we consider human rights as part of every decision we make that may affect people – be they employees, clients, members of the public, or participants in our supply chain. We consider the impacts of our actions and inactions on all people.

The United Nations has developed a series of sustainable development goals (SDGs), which include goals related to human rights. These include:

- Good health and wellbeing
- Quality education
- Gender equality

The SDGs are targets for governments – however, companies such as ours also have a role to play in making sure the goals are met. This Policy is aligned to the SDGs, in order to help us to help our community – beginning with our own people.

In summary, we will always work to be aware of challenges related to human rights, and to address them actively and continuously. We will not tolerate discrimination or harm to our workers, partners, members of our supply chain, stakeholders, or to our community arising from our actions or inactions.

We will always act lawfully and ethically, and have the same expectations of our clients, suppliers and partners.

Our commitment

Castlepoint Systems is committed to respecting human rights, and to advancing the changes needed to ensure the world is a healthy, safe and fair place for all people.

We recognise the influence and impact we can have on human rights through our efforts and investments. We are committed to working closely with our stakeholders to identify and understand where we can minimise negative impacts, and realise positive ones.

Our approach is guided by the internationally recognised human rights set out in the *United Nations Universal Declaration of Human Rights*, the *International Covenant on Civil and Political Rights*, the *International Covenant on Economic, Social and Cultural Rights* and the eight ILO fundamental conventions encompassed by the *Declaration on Fundamental Principles and Rights at Work*¹. It includes a commitment to work to ensure that there is no modern slavery in our operations. We also recognise that voluntary principles and guidelines may also support our decisions on how we best respect the rights of vulnerable populations or other rights-holders.

¹ <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

Specific commitments

Good health and wellbeing

Reproductive, maternal, newborn and child health

We will always support our staff who are or wish to become new parents. To help support the best outcomes for maternal and child health, we will support members by providing flexibility, including the ability to work from home, flex their working time and take leave wherever possible. We will not tolerate discrimination against staff based on pregnancy, parental status, or breastfeeding.

Infectious diseases

We are a vaccine-friendly workplace, and we encourage all staff to receive all appropriate vaccinations to help ensure they are protected from communicable diseases. We will support this by remunerating staff for up to one hour to travel to a doctor or pharmacy and receive any vaccine. We will not require staff to travel to areas where the risk of contracting a communicable disease is high and cannot be effectively mitigated.

Other diseases, mental health and environmental risks

We support our staff who have health challenges, including mental health issues. We encourage staff to use leave or flexible working arrangements to help them prioritise their health, and take the time they need to recuperate or participate in preventative medicine or treatment. We support quiet hours, where staff are not expected to be available by phone or online outside of their normal work time except when this is an essential part of their role.

We recognise that cardiovascular disease, diabetes, cancers and chronic respiratory diseases can be managed or avoided in some small part by following a healthy lifestyle. To this end, we support staff participation in sports and other athletic activities during and adjacent to work hours, by providing flexible work arrangements to incorporate it. We also support healthy eating, and where we provide food, will always provide healthy options.

We take environmental risks seriously, and will never require staff to be exposed to unacceptable hazards in the course of their work. This includes cigarette smoke – we are a smoke-free workplace.

Lifelong learning opportunities for all

Education is one of the most effective ways to foster equality. We will support our staff to continue their education, by sponsoring their training, certifications and volunteering where possible, and by providing flexible working arrangements to facilitate learning participation.

Gender equality

We will always comply with non-discrimination laws, and we will also challenge unfair social norms and attitudes that can result in indirect discrimination against women in our workplace. We believe that people of all genders have equal value, and should be recruited, selected, developed, promoted and remunerated based on their skills, achievements and credentials. To this end we will seek to hire a balanced ratio of men and women, at all levels, and to include non-binary persons in our company without discrimination.

We have a policy of pay transparency, to help challenge the economic trend of paying men more than equally qualified women for the same work. We will always pay fair wages.

We recognise institutionalised challenges to gender equality in our society, and will work to break them down where we can. This includes by recognising that women are inordinately affected by domestic violence; responsibilities as primary and unpaid carers; expectation of unpaid and emotional labour; workplace sexual harassment; and lower accumulation of retirement savings and superannuation over their careers. We will work with our staff to disrupt these patterns in direct and indirect ways.

Full and productive employment

We recognise that informal employment limits stability, growth and comfort in people's lives. We will ensure that our supply chain does not include workers who are not protected or reported in their roles, and who do not have adequate benefits or wages.

Secondary to this, we also recognise challenges in the 'gig economy' of less formal employment. While on-demand work can have benefits for workers, including flexibility and autonomy, we recognise the potential negative impacts, including precarious work, enforced casualisation, uncertain hours, poor pay and involuntary overtime. We will not engage workers on an on-demand model unless they have adequate wages and protections.

Reducing inequality

We will empower and promote the social, economic and political inclusion of all people, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status. We believe that people of all backgrounds have equal value, and should be recruited, selected, developed, promoted and remunerated based on their skills, achievements and credentials. To this end we will seek to hire a diverse cohort of personnel, at all levels. We have a policy of pay transparency, to help challenge the economic trend of paying people from diverse backgrounds less for the same work.

We support our staff to practice religious and cultural observance during work time using flexible working arrangements, and to be free of discrimination based on their beliefs.

Peace and accountability

We recognise our potential role in perpetuating foreign corruption, fraud, bribery, terrorism and crime if we do not carefully evaluate, assure and monitor our supply chain. We will never pay bribes or choose to participate in corruption or money-laundering. We will not buy or sell services or products from or to governments or institutions engaged in human rights abuses.

We will always follow the rule of law in all jurisdictions we operate within. This includes by protecting personal and sensitive information from unauthorised access, use and disclosure; and by making our information available to those who request it where appropriate.

We will not invest in or otherwise support trading in controversial weapons², tobacco and tobacco products, gambling, materials for nuclear weapons, or fossil fuels. We commit to carbon-neutral and sustainable operations and will select suppliers in part based on this.

General commitments

Labour rights

Castlepoint Systems is committed to undertaking continuous efforts to ensure that there is no modern slavery or labour-related harm within our operations and supply chain.

Castlepoint Systems is committed to the following principles:

- No child labour or forced labour is used, and that employment is freely chosen
- All workers in our company and supply chain have fair wages and employment agreements
- Staff work hours do not exceed the maximum limit set by relevant legislation
- Everyone has the right to form and to join trade unions for the protection of their interests
- Workers experience fair and equal treatment and access to opportunity, and enjoy a work environment free of discrimination, harassment, intimidation or coercion relating directly or indirectly to protected attributes
- All worker health and safety is protected in the workplace
- Workers have access to fair procedures and remedies.

Discrimination

Castlepoint Systems is committed to inclusion and diversity. Our leaders are accountable for promoting diversity and inclusiveness.

We do not condone discrimination on the basis of protected attributes including, race, religion, national or ethnic origin, citizenship status, political opinion, age, marital or relationship status, carer responsibilities, sex, sexual orientation, gender identity, intersex status, pregnancy, parental status, breastfeeding, disability, veteran status, trade union activity or other legally protected status.

We expect all our business partners, clients and suppliers to practise non-discrimination.

We do not tolerate discrimination or retaliation against human rights defenders who are acting to address human rights on behalf of individuals or groups.

Indigenous Rights

Castlepoint Systems is committed to respecting the rights of Indigenous Peoples in line with the *United Nations Declaration on the Rights of Indigenous Peoples*³.

We acknowledge the Traditional Owners of country throughout Australia, and recognise their continuing connection to land, waters and culture. We pay our respects to their Elders, past, present and emerging.

² Including anti-personnel mines, nuclear weapons, cluster weapons, biological and chemical weapons, depleted uranium, and white phosphorus munitions.

³ <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>

Privacy

Castlepoint Systems is committed to treating the right to privacy as a fundamental human right in line with the *International Covenant on Civil and Political Rights*. As part of this commitment, we collect, store, and handle personal information in accordance with the Australian Privacy Principles as set out in the *Privacy Act 1988*.

Human rights due diligence

The *United Nations Guiding Principles on Business and Human Rights* set out the key elements of human rights due diligence, including assessing actual and potential human rights impacts; integrating and acting upon the findings; tracking responses; and communicating how impacts are addressed. We will follow these guidelines in our operations.

Grievance mechanisms

The *United Nations Guiding Principles on Business and Human Rights* fundamentally acknowledge that grievance mechanisms must be known, trusted and accessible to those who need it. Refer to the Castlepoint Systems *Discrimination and Harassment* and *Complaints Management* policies for more information.

Castlepoint Systems is committed to continuously improving our mechanisms and remediation processes through stakeholder engagement and dialogue, to better align with the expectations for effective mechanisms set out in the *United Nations Guiding Principles on Business and Human Rights*.

Policy Review

This policy is reviewed at least every two years. Castlepoint Systems is committed to continuously improving its human rights policy and approach by monitoring and evaluating progress on a regular basis, and working collaboratively with affected stakeholders.

This policy was adopted by Castlepoint Systems on	01 July 2019
This policy was last updated on	18 December 2019
This policy is due for review on	26 November 2022

For more information on Castlepoint Systems Human Rights Policy, please contact the Chief Executive Officer.