

DRAX GROUP POLICY

Human Rights

Published: July 2021

Version: 2.0

Table of contents

Contents

Table of contents.....	1
Introduction	2
Policy purpose	2
Applicability	2
Who to contact for help?.....	2
How to speak up.....	3
Human Rights	4
Policy statement	4
Definitions	4
Addressing human rights impacts	4
Community and Stakeholder Engagement	5
Key areas of risk.....	5
Remedy	7
Our Governance.....	7

Introduction

Policy purpose

The purpose of this policy is to set out Drax's approach to the protection of human rights. It covers a number of important areas including:

- Diversity and inclusion
- Collective bargaining and freedom of association
- Safe and healthy workplace
- Dignity at work
- Forced labour and human trafficking
- Child labour
- Work hours, wages, and benefits (fair pay)

Applicability

This policy applies to **ALL** colleagues, officers, and directors of Drax, and all third-party agents acting on behalf of Drax in commercial dealings.

Those covered by this policy:

- Must ensure that they have read, understood and will comply with this policy and be aware of their personal responsibility to ensuring compliance with relevant laws
- Are expected to conduct business ethically and transparently
- Should be aware that there are serious personal, reputational, financial and commercial consequences of failing to comply with this policy

Who to contact for help?

If you have any comments or questions about this policy, please contact:

Name: Business Ethics Manager
Email: drax.compliance@drax.com
Phone: 44 (0)7515 579703

How to speak up

If you become aware of any circumstances which you believe contravene this policy or may risk contravening it, refer to the [‘How to report concerns’](#) section of the Group Business Ethics Sharepoint Site.

Anyone who raises a concern in good faith will not face retaliation because of their actions, even if they turn out to be mistaken. However, failure to report may mean that you are at risk of Drax taking action against you.

When raising a concern via our confidential SpeakUp hotline, you may choose to either include your identity or remain anonymous (see Speak Up (whistleblowing) policy for further information).

Human Rights

Policy statement

‘We ensure that people are treated with dignity and respect’

At Drax we take our legal and ethical obligations seriously. We are committed to high ethical standards and to conducting our business with honesty, integrity and in accordance with all applicable laws and regulations. We have a zero tolerance of behaviour (acts or omissions) that could lead to a failure to comply with human rights laws.

Respect for human rights is fundamental to the sustainability of our business and the communities in which we operate.

We will not tolerate human rights breaches - either in our own business or our supply chains. We are committed to identifying, preventing, and mitigating adverse human rights impacts resulting from or caused by our business activities.

We are committed to the respect of human rights in line with international principles encompassed in the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

We also seek to comply with modern slavery laws in all the countries in which we operate, including the UK Modern Slavery Act 2015 (Modern Slavery Act) and the US Trafficking Victims Protection Act 2000.

Definitions

Modern slavery covers forced labour, bonded labour, human trafficking, and the exploitation of children and/or vulnerable persons.

Monitoring and addressing human rights impacts

We recognise that we must take steps to identify and address any actual or potential adverse impacts with which we may be involved whether directly or indirectly through our own activities or our business relationships. We manage these risks by acting on concerning due diligence findings, supplier engagement, site visits, audit results, ongoing monitoring reports etc.

We understand that human rights due diligence is an ongoing process that requires particular attention at certain stages in our business activities, such as when we form new partnerships or our operating conditions change, as these changes may create new potential or actual impacts on human rights.

In certain countries where we source, there are particularly high, systemic risks of human rights abuses. We will undertake additional due diligence to assess these risks and address them effectively.

We recognise the importance of dialogue with our colleagues and external stakeholders who are or could potentially be affected by our actions. We pay particular attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalisation and recognise that women and men may face different risks.

Community and Stakeholder Engagement

Drax recognises its impact on the communities in which it operates and is committed to engaging with stakeholders in those communities to ensure that we listen to, learn from, and take into account their views as we conduct our business.

We believe that local issues are most appropriately addressed at the local level. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

Key areas of risk

Human rights breaches can occur in a number of ways. Below are the key areas you should be aware of in particular:

Diversity and inclusion

Drax values the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equality and intolerance of discrimination and harassment. We create and maintain a working environment that is both safe and supportive of all our people and where everyone has the opportunity to realise their potential.

We are dedicated to maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, colour, national or social origin, religion, age, disability, sexual orientation, political opinion or any other status protected by applicable law.

The basis for recruitment, hiring, placement, training, compensation, and advancement at Drax is qualifications, performance, skills, and experience.

Regardless of personal characteristics or status, Drax does not tolerate disrespectful or inappropriate behaviour, unfair treatment, or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. These principles apply not only to colleagues but also to the business partners with whom we work.

Freedom of Association and Collective Bargaining

We respect our colleagues' right to join, form or not to join a labour union without fear of reprisal, intimidation, or harassment. Where colleagues are represented by a legally recognised union, we are

committed to establishing a constructive dialogue with their freely chosen representatives. Drax is committed to bargaining in good faith with such representatives.

Safe and Healthy Workplace

At Drax, we're committed to each and every one of us going home safe and well, every day. Our vision is for OneSafeDrax - which means ensuring zero harm for our colleagues and the public, and recognising our people are at the heart of everything we do and is fundamental to our overall success. Together, we all share responsibility for the safety, health and wellbeing of ourselves and our colleagues. We apply systematic ways to identify risks, and a hierarchy of control to mitigate them. We comply with all applicable safety, health and wellbeing requirements, legal and otherwise, wherever we conduct business and wherever we undertake work activities for Drax. We consult and seek participation from, colleagues on our risks so we can proactively look for ways to improve our performance.

Dignity at work

Drax is committed to maintaining a workplace that is free from violence, bullying, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.

Where a complaint of bullying or harassment is raised, prompt action will be taken to investigate the complaint, which may lead to corrective action including disciplinary action against the offender.

Appropriate safeguards for colleagues will be provided as needed and will be maintained with respect for employee privacy and dignity.

Forced Labour and Human Trafficking

Drax prohibits the use of all forms of forced labour, including prison labour, bonded labour, slave labour and any form of human trafficking.

We seek to prevent and mitigate adverse human rights impacts that are linked to our operations through our business relationships. We conduct due diligence on those we work with and expect our suppliers to do the same. Supply chains at higher risk of modern slavery are subject to additional due diligence.

Child Labour

Drax prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required¹. Suppliers must not engage underage workers (as defined by applicable local laws).

¹ Noting that no hazardous work is carried out at Drax, as risk assessments are performed, and all necessary mitigations put in place.

Work Hours, Wages and Benefits (Fair Pay)

Drax compensates colleagues competitively relative to the industry and local labour market. We operate in full compliance with applicable wage, work hours, overtime, and benefits laws (including pension and health) and we expect suppliers to do likewise (as set out in our Supplier Code).

In the UK, Drax pays all colleagues the equivalent of the real Living Wage (as a minimum) and encourages its suppliers operating in the UK to do the same.

Remedy

We place importance on the provision of effective remedy wherever human rights impacts occur through company-based grievance mechanisms. We continue to build the awareness and knowledge of our colleagues on human rights, including labour rights, encouraging them to speak up, without retribution, about any concerns they may have, including through our grievance channels.

We also promote the provision of effective grievance mechanisms by our suppliers through our [Supplier Code](#).

Reporting

We provide transparency on our progress on human rights in our business and our supply chains. We disclose an annual Modern Slavery Statement in accordance with the UK Modern Slavery Act.

Our Governance

Our work in this area is overseen by the Ethics and Business Conduct Committee a sub-committee of our Executive Committee.