



HUMAN RIGHTS POLICY

PURPOSE/OBJECTIVE

At **Oman Aluminum Processing Industries (OAPIL)**, we are committed to upholding the highest standards of human resources practices and ensuring the protection of labor rights across our organization. This Human Rights Policy outlines our commitment to providing a fair, safe, and inclusive workplace for all employees. This policy applies to all employees, contractors, and suppliers associated with **OAPIL**.

ELIGIBILITY

This Human Rights Policy applies to all employees, including full-time, part-time, temporary, and contract employees of **OAPIL**.

KEY ASPECTS

Supplier Responsibility

OAPIL expects its suppliers and business partners to adhere to the same high standards of respect for human rights. We will work collaboratively with our suppliers to promote and ensure adherence to this policy. We will evaluate suppliers based on their commitment to human rights and may terminate relationships with those who fail to comply.

Minimum Age Requirement for Employment

OAPIL is committed to upholding the rights of children and ensuring a safe and healthy work environment. Accordingly, the company shall not employ individuals below the legal minimum age as determined by applicable laws and regulations. Prospective employees will be required to provide valid proof of age before employment.



The minimum age for employment at **OAPIL** is 18 years, except in cases where local legal requirements specify a higher minimum age for employment. Where the local legal requirement sets a higher minimum age, that requirement will take precedence.

No individual under the minimum age requirement, shall be eligible for employment at **OAPIL**. This includes full-time, part-time, temporary, or contract positions.

We recognize that young workers between the ages of 15 and 18 may have educational and vocational needs, and we are committed to providing opportunities for their development through appropriate educational and training programs, in compliance with applicable laws and regulations

Non-Discrimination and Equal Opportunity

OAPIL is an equal opportunity employer. We are committed to providing equal employment opportunities to all individuals without regard to race, color, religion, sex, national origin, age, disability, genetic information, sexual orientation, gender identity, or any other protected characteristic as defined by applicable law.

We prohibit any form of discrimination, harassment, or retaliation against employees based on any protected characteristic. All employment decisions, including but not limited to hiring, promotion, termination, and compensation, will be made solely on the basis of merit, qualifications, and business needs.

Equal Employment Opportunity

OAPIL is an equal opportunity employer. We provide equal employment opportunities to all individuals, regardless of their race, color, religion, national origin, sex, gender identity, sexual orientation, age, disability, genetic information, marital status, pregnancy, veteran status, or any other legally protected characteristic. All employment decisions, including but not limited to recruitment, hiring, promotions, transfers, training opportunities, and terminations, will be based on qualifications, merit, and business needs.

Prohibition of Discrimination and Harassment

Discrimination, harassment, or retaliation of any kind is strictly prohibited at **OAPIL**. This includes, but is not limited to, discrimination or harassment based on race, color, religion,



national origin, sex, gender identity, sexual orientation, age, disability, genetic information, marital status, pregnancy, veteran status, or any other protected characteristic. Harassment includes unwelcome verbal, non-verbal, or physical conduct that creates a hostile, intimidating, or offensive work environment.

Reasonable Accommodation

OAPIL committed to providing reasonable accommodations to employees with disabilities or other limitations, in accordance with applicable laws. We strive to ensure that individuals with disabilities have equal opportunities to perform their job duties, access facilities, and participate in company-sponsored programs or activities. Employees who require accommodation should contact the Human Resources Department to discuss their needs in a confidential manner.

Non-Retaliation

OAPIL strictly prohibits retaliation against any individual who reports discrimination, harassment, or participates in an investigation related to such complaints. Employees who make good faith reports or cooperate in investigations will not face any adverse employment action as a result of their involvement. Retaliation against any employee is a violation of company policy and will result in appropriate disciplinary action, up to and including termination.

Responsibility and Accountability

Every employee at **OAPIL** is responsible for fostering an inclusive work environment and treating others with respect and professionalism. Managers and supervisors have a particular responsibility to prevent and address any discriminatory behavior or harassment within their teams. Any employee who becomes aware of potential violations of this policy should promptly report such incidents to the Human Resources Department.

Health and Safety

We are dedicated to providing a safe and healthy work environment for all employees. We comply with applicable health and safety laws, regulations, and standards and strive to exceed them whenever possible.



We prioritize the prevention of accidents, injuries, and occupational illnesses by implementing effective safety measures, providing adequate training, and promoting a culture of safety awareness and responsibility.

Leave Days, Working Hours and Payment of Overtime

OAPIL recognizes the importance of work-life balance and promotes the well-being of its employees. The company will provide employees with a reasonable number of leave days, as per local labor laws and regulations, including vacation, sick, and personal days. Working hours shall adhere to applicable laws and industry standards, promoting a healthy and productive work environment.

Leave Entitlement

- **Annual Leave:** All employees of **OAPIL** are entitled to annual leave in accordance with applicable labor laws and company policies. The annual leave entitlement shall be based on the employee's length of service, as specified in the company's leave policy. Annual leave may be taken in whole or in part, subject to prior approval by the employee's supervisor or manager.
- **Public Holidays:** In addition to annual leave, employees shall be entitled to paid leave on recognized public holidays as per the local regulations and company policies.
- **Sick Leave:** Employees are eligible for sick leave as per the applicable labor laws and company policies. Sick leave may require submission of a medical certificate or other relevant documentation as specified by the company.
- **Maternity/Paternity Leave:** Female employees shall be entitled to maternity leave as provided by applicable labor laws and company policies. Similarly, male employees shall be eligible for paternity leave as per the company's policies.
- **Special Leave:** The company may grant special leave for various reasons, such as bereavement, marriage, or family emergencies, subject to the discretion of the management and applicable policies.
- **Leave Accrual and Carryover:** Annual leave entitlement shall accrue on a pro-rata basis throughout the year. Unused annual leave may be carried forward into



the next year, subject to a maximum limit set by the company and any regulatory requirements.

Leave Application and Approval Process

- **Application Procedure:** Employees are required to submit leave requests in advance through the designated leave management system or any other approved method as specified by the company. The leave application should include the intended dates of absence, the reason for leave, and any relevant supporting documents if applicable.
- **Approval Process:** Leave requests shall be reviewed by the employee's immediate supervisor or manager. Approval will be based on operational requirements, staffing considerations, and the employee's leave balance. The company reserves the right to request further information or documentation before granting or denying leave.
- **Timely Notification:** Employees should provide reasonable notice for all types of leave, except in cases of unforeseen circumstances or emergencies. The minimum notice period for annual leave and other planned leave types shall be determined by the company.

OAPIL is dedicated to fair compensation practices that comply with applicable laws and industry standards. The company shall provide employees with wages and benefits that meet or exceed the legal minimum requirements. In cases where employees are required to work overtime, they will be compensated at a rate not less than the prevailing legal standards.

Calculation of Overtime Payment

Overtime hours shall be calculated on a weekly basis, starting from the conclusion of an employee's regular working hours for the week. The overtime rate shall be set at ____ times the employee's regular hourly wage for each hour of overtime worked. The overtime rate shall apply to all hours worked beyond the regular working hours, up to the maximum allowable limit defined by labor laws or regulations.



Minimum Rate of Overtime Payment

We adhere to local laws and regulations concerning working hours, breaks, and rest periods. We strive to maintain a reasonable work-life balance for our employees. Overtime work is voluntary and compensated in accordance with applicable laws and regulations. We do not tolerate the coercion or exploitation of employees to work excessive hours.

OAPIL is committed to complying with all applicable labor laws and regulations regarding overtime compensation. The minimum rate of overtime payment shall not be lower than the rate specified by the relevant labor laws and regulations in force. In the event that the applicable labor laws or regulations establish a higher minimum rate of overtime payment than outlined in this clause, the higher rate shall prevail.

Compensation and Benefits

We provide competitive and fair compensation to our employees, in line with industry standards and local laws. Salaries and benefits are determined based on factors such as job responsibilities, qualifications, and performance.

We are committed to providing benefits that support the well-being and welfare of our employees, such as healthcare coverage, retirement plans, and employee assistance programs, to the extent allowed by local laws and regulations.

Labor Rights and Freedom of Association

OAPIL respects the rights of its employees to associate freely, join or not join labor unions, and engage in collective bargaining. The company will not interfere with or obstruct employees' rights to form, join, or participate in lawful labor organizations of their choice. **OAPIL** shall negotiate in good faith with recognized employee representatives, promoting open communication and fair negotiations.

We respect the right of employees to join or not join labor organizations, as permitted by local laws. We recognize the importance of freedom of association and collective bargaining in maintaining a healthy and productive work environment. We commit to



engaging in constructive dialogue with employee representatives and supporting their rights to negotiate and bargain in good faith.

Freedom of Association

The Company recognizes and respects the right of all employees to join or not to join any association, organization, or trade union of their choice, as protected by national and international labor laws and conventions. The Company shall not discriminate against any employee based on their membership or non-membership in any association, organization, or trade union.

Employee Representation

The Company acknowledges the importance of employee representation in promoting effective communication and fostering a harmonious work environment. The Company shall provide employees with opportunities to elect or designate representatives, subject to applicable laws, to engage in dialogue and consultations with management on matters related to terms and conditions of employment, workplace safety, and other employment-related issues.

Collective Bargaining

The Company recognizes the right of employees, through their chosen representatives, to engage in collective bargaining on matters relating to their terms and conditions of employment, consistent with applicable laws. The Company shall engage in good faith negotiations with recognized employee representatives or trade unions, aiming to reach agreements that are fair and mutually beneficial. The Company shall not engage in any form of interference, coercion, or discrimination against employees or their representatives for exercising their right to engage in collective bargaining.

Ethical Conduct and Business Integrity

We expect all employees to uphold high standards of ethical conduct in their work and interactions with colleagues, customers, and stakeholders. This includes, but is not limited to, maintaining confidentiality, avoiding conflicts of interest, and acting with integrity and honesty.



We have zero tolerance for any form of bribery, corruption, or unethical practices. Employees are expected to comply with all applicable laws and regulations related to anti-bribery and anti-corruption.

Non-Seizure of Passport for Migrant Labor (No Forced Labor)

OAPIL recognizes and values the rights and dignity of all individuals employed by the company, including migrant laborers. We are committed to upholding international labor standards and ensuring that our operations are conducted in a manner that respects and protects the fundamental rights of all workers. In line with this commitment, we hereby establish the following Non-Seizure of Passport for Migrant Labor (No Forced Labor) clause as an integral part of our Human Rights Policy:

Human Rights Policy strictly prohibits the seizure, confiscation, retention, or withholding of passports or other personal identification documents belonging to migrant laborers by the company or any of its representatives. We recognize that retaining possession of passports or similar documents restricts the freedom of workers and can create conditions conducive to forced labor or other exploitative practices.

As an employer, **OAPIL** will only request and verify necessary identification and immigration documents as required by law, regulations, or legitimate operational requirements. We will not retain any original passports or personal identification documents of migrant laborers beyond the period required for verification purposes.

We are committed to ensuring that all migrant laborers employed by **OAPIL** have unrestricted access to their passports or personal identification documents at all times. The company will not prevent workers from accessing their own documents or restrict their movements based on the possession of such documents.

In cases where migrant laborers voluntarily choose to deposit their passports or personal identification documents with the company for safekeeping during their employment, **OAPIL** will implement appropriate measures to ensure the confidentiality and secure storage of these documents. Workers will have the right to retrieve their passports or personal identification documents at any time upon request, without any undue delays or obstacles.



Grievance Mechanisms and Whistleblower Protection

OAPIL recognizes that employees should be able to report workplace concerns, including policy violations, without fear of retaliation. The company will establish channels for employees to report such concerns, ensuring confidentiality and protection against retaliation.

We maintain effective grievance mechanisms that allow employees to voice their concerns, complaints, or suggestions. Employees will not face retaliation for reporting workplace issues or participating in investigations.

Whistleblowers who report illegal, unethical, or inappropriate behavior in good faith will be protected against retaliation, consistent with applicable laws and regulations.

Harassment-Free Workplace

OAPIL is committed to maintaining a harassment-free workplace for all employees. Harassment, in any form, including verbal, physical, visual, or written, is strictly prohibited. Employees are expected to refrain from engaging in any behavior that may reasonably be perceived as harassment or create a hostile work environment. **OAPIL** will promptly investigate any reports of harassment and take appropriate disciplinary action against individuals found to have violated this policy.

Reporting Violations

OAPIL encourages all employees to report any violations or threats they experience or witness in the workplace. Employees can report violations to their immediate supervisor, the Human Resources department, or any designated authority within the company. Whistleblower protections will be in place to safeguard employees who report violations in good faith from retaliation.

Non-Retaliation

OAPIL strictly prohibits retaliation against any employee who reports a violation or threat in good faith or participates in an investigation. Retaliation against individuals reporting in good faith will result in disciplinary action, up to and including termination of employment.



COMPLIANCE & MONITORING

OAPIL shall review and monitor its compliance with this clause on a regular basis to ensure adherence to all applicable labor laws and regulations.

Any violations or concerns related to Human Rights Policy should be promptly reported to the Human Resources department, which will investigate and address them in a timely manner.

OAPIL prohibits any form of retaliation against employees who report violations or express concerns related to overtime payment.

AMENDMENT & COMMUNICATION

Any changes or amendments to this clause shall be communicated to all employees in a clear and timely manner.

The company shall provide training and educational resources to supervisors, managers, and employees to promote understanding and compliance with this clause.

CONCLUSION

By implementing this Human Rights Policy, **(OAPIL)** reaffirms its commitment to creating a workplace that values and respects the rights and well-being of all employees. This policy serves as a framework for our ongoing efforts to promote fairness, diversity, and social responsibility throughout our organization.

A handwritten signature in black ink, appearing to read "C. A. [unclear]", is written over a rectangular box. The signature is stylized and somewhat illegible.