

DRAX GROUP POLICY

# Human Rights

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# Introduction

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## Applicability

This policy applies to colleagues, officers, and directors employed by Drax (collectively 'colleagues') and non-permanent workers who act on behalf of Drax in commercial dealings.

## Contact us

If you have any comments or questions about this policy, please contact the Business Ethics team:

Email: [BusinessEthics@Drax.com](mailto:BusinessEthics@Drax.com)

Phone: +44 (0)7842 312766

## How to speak up if you have concerns

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, speaking up about concerns is important, even if you turn out to be mistaken. Failure to report may mean that issues are not resolved, and you may be at risk of Drax acting against you. When raising a concern via our confidential Speak Up 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 are committed to upholding human and labour rights across our operations and supply chain. We act in accordance with all applicable laws and regulations and set the expectation within our contracts and Supplier Code of Conduct that our suppliers and business partners to do the same.

Drax takes a zero-tolerance approach to behaviour that could lead to a failure to comply with human rights law or instances of modern slavery or human rights abuses. Respect for human rights is fundamental to the sustainability of our business.

We work with our suppliers to gain transparency of supply chain data in order to identify risks and prevent and mitigate adverse human rights abuses.

We are committed to collaborating with our supply chain to promote fundamental human and labour rights.

We seek to comply with the human rights and modern slavery laws in all the countries in which we operate and 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 European Convention on Human Rights, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

## Policy purpose

The purpose of this policy is to outline the human rights standards Drax abides by, detail our human rights efforts in line with legislation, detail our prevention and remediation approach, and provide a reference point to colleagues and non-permanent workers on how to comply with legislation in their day-to-day work and how to raise concerns related to human rights.

The policy covers multiple important areas such as:

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

## Addressing human rights

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 assess and manage these risks by conducting due diligence, engaging with suppliers, site visits, audits/audit reports, and continual monitoring.

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 we know these changes may create new potential or actual impacts on human rights.

We have a Supplier Code of Conduct which we seek to incorporate into relevant agreements. Our Supplier Code includes such topics as human and labour rights and requires our suppliers to cascade our standards to associated sub-contractors.

Drax provides training to colleagues on modern slavery risks and how to spot the signs of this at times, invisible crime.

## Assessing Risk

In certain countries where Drax sources, there may be potentially high and inherent systemic risks of human rights abuses. In these cases, we undertake an enhanced due diligence exercise to assess risks in a bespoke manner. This allows Drax to have the opportunity to mitigate any known issues effectively before engaging in a commercial relationship. Ethical due diligence is an essential component of our human rights risk management. On a risk proportionate basis, Drax may obtain independent third-party assessments of selected suppliers for assurance purposes or where due diligence requires further information.

Drax recognises its impact on the communities in which it operates and is committed to engaging with stakeholders in those communities to listen to, learn from, and consider their views as we conduct our business. Not only is Drax responsible for preventing and mitigating accidents and/or emergencies related to our operations, but we also collaborate to remedy potential or actual negative impacts.

We are committed to fostering goodwill in the communities in which we operate through locally relevant initiatives.

## Key areas of risk identified

Human rights breaches can occur in many ways. Below are the key areas of risk you should be aware of (although, not an exhaustive list).

### Health and Safety in the Workplace

At Drax, we are committed to each 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 effectively. 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. Drax is committed to ensuring that protective equipment is provided for all relevant roles and that working conditions are safe.

### 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. Importantly, colleagues will not face any form of retaliation when they disclose or report any discrimination, oppose a practice believed to be unlawful discrimination or report harassment. Appropriate safeguards for colleagues will be provided as needed and will be maintained with respect for employee privacy and dignity. We have a Group-wide Dignity at Work Policy which can be found on the Drax internal SharePoint.

## 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 eligible colleagues the equivalent of the Real Living Wage (as a minimum) and encourages its suppliers operating in the UK to do the same. Outside of the UK, we pay all colleagues in accordance with the relevant statutory requirements for their work location.

Drax expects that migrant workers working for, or on behalf of the company should always have a recognised employment relationship and legitimate contract in place within the country of work.

Drax supports the International Labour Organisation's (ILO) Employer Pays Principle that no workers should bear the cost of recruitment fees. Drax prohibits all worker recruitment fees (as defined by the ILO).

## Diversity, equity, and inclusion

At Drax, we are committed to building a fair, safe and inclusive working environment where everyone has the tools to do their best work and feel they belong. We seek to ensure that our colleagues feel safe to think differently and share new ideas that take us closer to our goals and that our workplace better represents the communities and customers we serve. At Drax we are committed to promoting a diverse and inclusive workplace that supports everyone through inclusive ways of working to enable equal access to opportunities for all.

We promote a culture of self-respect, tolerance, and support for all colleagues and those with whom we work. We will not tolerate any form of discrimination, bullying or harassment and will make active efforts to protect all from unfair treatment. Our Diversity, Equity & Inclusion (DEI) Policy can be found on our internal SharePoint.

## Freedom of Association and Collective Bargaining

We respect our colleagues' right to join or form a labour union (or not) 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 open dialogues and bargaining (where appropriate) in good faith with such representatives.

To clarify:

- Colleagues can establish or join worker organisations of their own choosing
- Drax respects the full freedom of workers' organisations to draw up their constitutions and rules
- Drax respects the rights of workers to engage in lawful activities related to forming, joining, or assisting a workers' organisation, or to refrain from doing the same, and will not discriminate or punish colleagues for exercising these rights

- Drax negotiates, where this is the wish of colleagues represented, with lawfully established workers' organisations and/or duly selected representatives in good faith and with the best efforts to reach agreement
- Collective bargaining agreements are implemented where they exist

## Forced Labour and Human Trafficking

Drax prohibits the use of all forms of forced and compulsory labour. All employment relationships are voluntary and based on mutual consent, without the threat of a penalty.

We seek to prevent and mitigate adverse human rights impacts that are linked to our operations through our business relationships. We conduct reasonable and proportionate due diligence on our suppliers and set the expectation within our Supplier Code of Conduct for our suppliers to do the same. Supply chains at higher risk of modern slavery are subject to enhanced due diligence. Our due diligence process seeks to mitigate such things as bonded labour, withholding of wages, illegal fees, restriction of movement, retention of identity documents, etc.

## Child Labour

Drax prohibits (both in its own business and its supply chain) all forms of child labour, including the hiring of individuals that are:

- Under 15 years of age, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher
- Under 18 years of age for positions in which are mentally, physically, socially or morally dangerous to the child or interfere with the child's opportunity to attend school
- Except for the purpose of training within approved national laws and regulations

## Respecting the Rights of Indigenous People

We respect the rights of Indigenous peoples (IPs) and have in place a dedicated IPs policy. Drax is a committed to working with Indigenous communities in a manner that recognises and respects all legal and constitutional rights enshrined in the Universal Declaration of Human Rights (UNHR), the United Nations Declaration on the Rights of Indigenous People (UNDRIP) and ILO Convention 169. Drax seeks to ensure that our projects and operations are carried out in a respectful and environmentally responsible manner.

## 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 those covered by this policy, 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](#).

## Multi-Stakeholder Initiatives

Drax has a dedicated Modern Slavery Working Group, colleagues from across the business consider developing risks and Drax participates in external initiatives intended to support human rights. Drax is part of the UN Global Compact Modern Slavery Working Group, the Utilities Against Slavery Working Group (with Slave Free Alliance), Stella Maris Working Group and an Action Group with the Institute of Human Rights and Business. We also provide financial support for the continued operation of the UK's Modern Slavery and Exploitation Helpline (operated by Unseen UK).

## Our Governance and reporting

We provide transparency on our progress on human rights in our business and our supply chains. We make public our annual Modern Slavery Statement, in accordance with the UK Modern Slavery Act and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act

Human Rights efforts taking place within Drax are reported regularly to senior stakeholders. Work in this area is overseen by the Ethics and Business Conduct Committee, a sub-committee of the Executive Committee.

Information on Human Rights can be found within our Code of Conduct, Supplier Code of Conduct, Modern Slavery Statements (Annual), Annual Reports, all available on [drax.com](http://drax.com)