



# **HUMAN and CHILDREN’S RIGHTS POLICY**

## **1. Introduction**

The BCC 95 Ltd Human and Children’s Rights Policy articulates our responsibility to respect all Human Rights in line with the UN Guiding Principles on Business and Human Rights (the UNGPs). This Policy focuses on the areas that have been identified as priorities for our industry.

The Policy is derived from:

- The United Nations (UN) Universal Declaration of Human Rights and the two International Covenants making up the International Bill of Human Rights;
- The International Labour Organisation’s (ILO) Declaration of Fundamental Principles and Rights at Work
- The United Nations Global Compact.

Together, for the purposes of this Policy, the above documents are called the “International Human Rights Declarations”.

## **2. Purpose**

The BCC 95 Ltd Human and Children’s Rights Policy sets out the principles for our actions and behaviour in relation with human rights. The Policy and associated practices are expected to strengthen over time as the Company’s operating procedures create an environment where human rights are respected, and to also help ensure that we do not engage in activities that directly or indirectly violate the human rights.

## **3. Scope**

This Policy applies to all employees of BCC 95 Ltd subsidiaries and affiliates worldwide. In addition, our subcontractors, working at our sites, are expected to comply with this Policy. We will promote its principles to our subcontractors and suppliers through our Basic requirements for suppliers, and also by driving industry- based social and environmental standards, and we will also engage customers and joint venture partners on these issues.

The BCC 95 Ltd Human and Children’s Rights Policy complements and brings together the human rights aspects from other Company policies and guidelines. These include our Code of Business Conduct, the Health & Safety, Environment and Human Resources policies and the Anti-Corruption guidelines. By implementing this Policy, we are subject to the laws of the many countries with which we collaborate and we are committed to comply with all such applicable laws.

Where our Policy, procedures and external commitments are more stringent than local laws, we operate in accordance with our standards. In situations where local law is less stringent than the International Human Rights Declarations, we endeavour to develop a response on a case-by-case basis while using our Policy as a guideline. Where local law prohibits us from upholding certain aspects of this Policy, we comply with these local laws while seeking to respect human rights.

## **4. Specific commitments and provisions**

Employees: We are committed to respect the human rights of our employees. We develop our employment policies with the aim to achieve uniform worldwide application of the relevant aspects contained in the International Human Rights Declarations. We are committed to train our employees to be aware of and respect human rights in the workplace and in the local communities directly impacted by our operations.



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**Business partners:** We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, monitoring, certification and contractual provisions. Suppliers operating in, or procuring from, areas where we identify our most severe risks, will be the key focus of this engagement.

**Local communities:** We seek to respect the human rights of local potentially-affected peoples and to develop an understanding of the cultures, customs and values that prevail in our local communities by developing an inclusive and open dialogue with the people affected by our operations. The Procedure requires us to conduct an open and inclusive dialogue with local communities, including engaging with often under-represented groups such as women, children and Indigenous Peoples.

#### **5.Promoting Health and Safety**

BCC 95 Ltd is committed to work towards a goal of zero accidents, injuries and general wellbeing in the workplace. This is endorsed by the Health and Safety Policies and Procedures that promote our philosophy of Safe Sustainable Labour

Eliminating Forced or Compulsory Labour, human trafficking and all forms of Modern Slavery

BCC 95 Ltd opposes the use of forced or compulsory labour, human trafficking and all forms of modern slavery both within its own operations and through its supply chain. We will undertake work with our subcontractors and suppliers including due diligence within our supply chains to avoid indirectly benefitting from or promoting such illegal practices. BCC 95 Ltd will ensure that operational grievance mechanisms allow for cases of forced labour to be submitted and addressed.

#### **6.Abolishing Child Labour**

BCC 95 Ltd opposes the use of child labour. We will work in collaboration with subcontractors and suppliers to prevent and remove any instances of child labour in a manner that is consistent with the best interests of the child.

Eliminating Unlawful Discrimination in the Workplace

BCC 95 Ltd is committed to ensure that each employee and potential employee is treated with fairness and dignity. Accordingly, any unlawful discriminatory practice based on race, colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, property, political or other opinion, disability, birth or any other basis will not be tolerated. The Company seeks to provide each employee with equal opportunity for advancement without discrimination.

#### **7.Eliminating Harassment and Violence**

BCC 95 Ltd is committed to promote a work environment free of any form of harassment, exploitation, abuse or violence as defined by the laws of each country in which we operate.

#### **8.Respecting Indigenous Peoples' Rights**

BCC 95 Ltd respects the rights of Indigenous Peoples as defined by applicable national and emerging international standards.

#### **9. General Data Protection Regulation (GDPR)**

BCC 95 Ltd has implemented the Data Protection Directive to protect and empower all coworkers, customers and suppliers data privacy acc to EU law and to approach data privacy. Responsible for the implementing and supervising the functioning of the system in the organization is the manager of the company.

#### **10. Governance and accountability**



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Responsibility for the implementation of this Policy lies with the responsible for each segment. These executives will report on any human rights hotspots arising within our operations or our supply chain to the Manager at least annually.

#### **11. Implementation**

The Company's implementation of this Human and Children's Rights Policy occurs through our due diligence procedures as well as targeted interventions and this is expected to strengthen over time. The management increasingly focuses on the potential for severe human rights issues. Implementation is supported by Procurement, Human Resources, Internal Audit, Compliance, Community, Environment, and Corporate Responsibility functions.

In the event of any employee becoming aware of human rights hotspots within our operations or supply chain, they will inform the responsible for the relevant segment as soon as possible, and share this information with the Management.

#### **12. Review and monitoring**

BCC 95 Ltd will periodically review the Policy and our implementation with respect to its suitability and effectiveness.

BCC 95 Ltd may seek to commission independent third parties to monitor its adherence to this Policy.

We also welcome feedback from, and dialogue with, interested parties. All feedback and comments on this Policy should be sent to [managers@bcc95.com](mailto:managers@bcc95.com).

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