



Human Rights and Environmental Policies

Sustainability: for the love of sugar

December 2021

Background

Sustainability is a topical subject world over. A sustainable world powered by sustainable technologies and industries is the goal to which focus has shifted. The Eswatini sugar industry has embraced sustainability as a priority and continues to be a key strategic objective. In order to create value for sugar and its by-products, it is very important to strive to meet all sustainability requirements for continuous improvement and alignment with best management practices. The adoption of the Human Rights and Environmental Policies is one way in which the Eswatini sugar industry is working towards being a sustainable industry.

Human Rights Policy

This policy was developed and approved through industry structures as a model for human rights policies within the industry. The policy covers the stance on elements such as child labour; forced labour and human trafficking; freedom of association and collective bargaining; and, safe and healthy workplace. These are important elements for compliance to national and international regulations as well as meeting customer requirements.

The Environmental Policy

This policy is a revision of the previously adopted industry environmental policy, and updates it with elements that consider current legislation and emerging customer requirements. Updates to the policy include active management of the environment by promoting a culture where employees and service providers can identify, mitigate and report potential environmental hazards and risks.

Industry adoption and adaptation

In December 2020, Council approved the two policies for adoption by all industry members. The two policies are a minimum standard for human rights and environmental matters, and therefore, industry players are encouraged to adapt these policies to their respective environments as required, using them as a framework for developing their own policies. [Uncontrolled copies are annexed herein]. Due to the prevailing COVID-19 pandemic, the planned workshops on these policies throughout the industry have been very limited. It is for this reason that all industry members are requested to go through the two policies and adopt them as part of the industry drive for compliance on human rights and environmental issues. Once signed, they are to be displayed in offices and a copy be shared with ESA for industry record purposes. Follow up on progress on the adoption will be done quarterly.

For more information on these policies, stakeholders are referred to the Sustainability Programme Coordinator at Technical Services, Simunye.

Prepared by: Nkosinathi Sihlongonyane (Sustainability Programme Coordinator)



ESWATINI SUGAR ASSOCIATION

QPL 031 – ESA HUMAN RIGHTS POLICY

PROCESS OWNER: Chief Executive Officer

OBJECTIVE: To spell out the rules and procedures that govern human rights matters.

APPLICATION: To all ESA employees

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1. Introduction

- 1.1 The mission of the Eswatini Sugar Association (ESA) is to provide quality sugar products and services in a sustainable manner. In pursuing its mission, ESA recognises that its activities can have an impact on the communities in which it operates, some of which may be positive and others negative. It is the policy of ESA to ensure that people are treated with dignity and respect.
- 1.2 ESA, through this Policy, is committed to adhering to international human rights principles encompassed/espoused 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.
- 1.3 ESA respects human rights and is committed to identifying and preventing any adverse human rights impacts in relation to business activities through human rights due diligence and preventive compliance processes.

2. Scope

The scope of this policy is limited to those areas which are within ESA's competence/ jurisdiction as defined by the statutory areas of intervention in the sugar value chain and the Sugar Industry Agreement. It excludes those areas where ESA is not directly involved, such as sugarcane growing and milling. However, ESA as a regulatory body encourages and works with all stakeholders to ensure that human rights are respected.

3. Main Elements

3.1 Community and stakeholder engagement

ESA recognises the impact of its business operations on the communities in which it operates. It is therefore committed to engaging with stakeholders in those communities to ensure that it listens to, learn from and consider their views as it conducts business. Where appropriate, ESA is committed to engaging in dialogue with stakeholders on human rights issues related to the its business.

3.2 Valuing diversity

3.2.1 ESA values the diversity of people and the contributions they make. It has a long-standing commitment to equal opportunity and does not accept discrimination and harassment in all their forms. ESA is dedicated to maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, religion, age, disability, political opinion or any other status protected by applicable law. The basis for recruitment, placement, training, compensation and advancement at ESA is qualification, performance, skills and experience.

3.2.2 Regardless of personal characteristics or status, ESA 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 even outside the work environment. ESA expects, through its Supplier code of conduct, that its business partners will adhere to these principles as a minimum.

3.3 **Freedom of association and collective bargaining**

ESA respects employees' right to join, form or not to join a labour union without fear of reprisal, intimidation or harassment in compliance with the Industrial Relations Act of 2000. Where employees are represented by a legally recognised union, ESA is committed to establishing a constructive dialogue with their freely chosen representatives. ESA is also committed to bargaining in good faith with such representatives.

3.4 **Safe and healthy workplace**

ESA provides a safe and healthy workplace and complies with applicable safety and health laws, regulations and internal requirements including the Occupational Safety and Health Act of 2001. ESA is dedicated to maintaining a productive workplace by minimising the risk of accidents, injury and exposure to health risks. ESA is committed to engaging with its employees to continually improve health and safety in workplaces, including the identification of hazards and remediation of health and safety issues.



3.5 **Workplace security**

ESA is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Where necessary, ESA is committed to cooperate with relevant state security entities to ensure safety and security of employees is not compromised.

3.6 **Forced labour and human trafficking**

3.6.1 ESA does not condone the holding of any person in slavery or servitude, the use of all forms of forced, bonded or compulsory labour in compliance with the Employment Act of 1980.

3.6.2 ESA stands against employees, subcontractors, subcontractor employees, and agents from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labour from a person by threats of serious harm to that person or another person, among others.

3.7 Child labour

ESA complies with all local laws on the minimum age of employment, as provided in the ILO Convention 138. ESA prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required, as provided for in ILO Convention 182 and in compliance with the Employment Act of 1980.

3.8 Work hours, wages and benefits

ESA compensates employees competitively relative to the industry and local labour market. ESA operates in full compliance with applicable wage, work hours, overtime and benefits laws.

3.9 Guiding and reporting for employees

ESA is committed to creating workplaces in which open and honest communications among all employees are valued and respected. ESA's policy is to follow all applicable labour and employment laws wherever it operates.

4. Review

The policy shall be reviewed as the need arises, but at least every two years to ensure that it remains in line with customer requirements and stakeholder expectations and any changes to local and international legislation and standards.



Revision: 1	Reviewed by:	Approved by: Chief Executive Officer	Approval Date:
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ESWATINI SUGAR ASSOCIATION

QPL 019 – ESA ENVIRONMENTAL POLICY

PROCESS OWNER: Chief Executive Officer

OBJECTIVE: To spell out the rules and procedures that govern ESA's impacts on environmental matters.

APPLICATION: To all ESA employees

1. Introduction

- 1.1 The mission of the Eswatini Sugar Association (ESA) is to provide quality sugar products and services in a sustainable manner. In pursuing its mission, ESA recognises that its activities can have an impact on the environment, some of which may be positive and others negative. It is the policy of ESA to make a positive contribution to the environment through minimising the negative impacts and maximising the positive impacts.
- 1.2 ESA is committed to the protection of the environment as one of the key pillars of ESA's long-term success and has embedded this in its corporate strategy. ESA strives to drive continuous improvement on environmental performance to minimize impact on the local and global environment.

2. Scope

The scope of this policy is limited to those areas which are within ESA's competence as defined by the statutory areas of intervention in the sugar value chain. It excludes those areas where ESA is not directly involved, such as sugarcane growing and milling. However, ESA as a regulatory body works with all stakeholders to support that the environment is protected.

3. Objectives

The primary goal of this Policy is to communicate ESA's commitment to conducting its business operations in ways which minimise adverse environmental impacts, promote sustainability and encourage continual improvement in environmental performance. ESA will endeavour to meet all long-term environmental commitments through the following objectives:

- 3.1 Comply with or surpass all applicable environmental legislation, regulations, and standards to which it subscribes;
- 3.2 Identify potential impacts and develop mitigation programs and controls which are regularly monitored and reviewed;
- 3.3 Commit to adapt its operations by using best practice guidelines in the Best Management Practice Manual (BMP) which was formed after consulting internationally recognised standards such as the ISO 14001 standard amongst others;

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- 3.4 Promote sustainability through efficient use of natural resources and energy, including reuse or recycling of waste resources where appropriate;
- 3.5 Promote a culture where employees and service providers can identify, mitigate and report any potential environmental hazards and risks;
- 3.6 Continual improvement by establishing environmental objectives and targets and a performance evaluation system with associated indicators;
- 3.7 Ensure our employees and stakeholders are appropriately informed of our policies, management systems and performance;
- 3.8 Ensure innovation through employee training, involvement and knowledge-sharing mechanisms.
- 3.9 Assess environmental impact of new processes or products intended for introduction to the business operations in advance.

4. Business Partners

ESA encourages its customers, contractors, suppliers and all other business partners to enhance their environmental awareness and implement and/or manage appropriate programmes for minimising environmental damage.

5. Review

The policy shall be reviewed as the need arises and at least every two years, to ensure that it remains in line with customer requirements and stakeholder expectations and any changes to local and international legislation and standards.



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