

Human Rights Framework

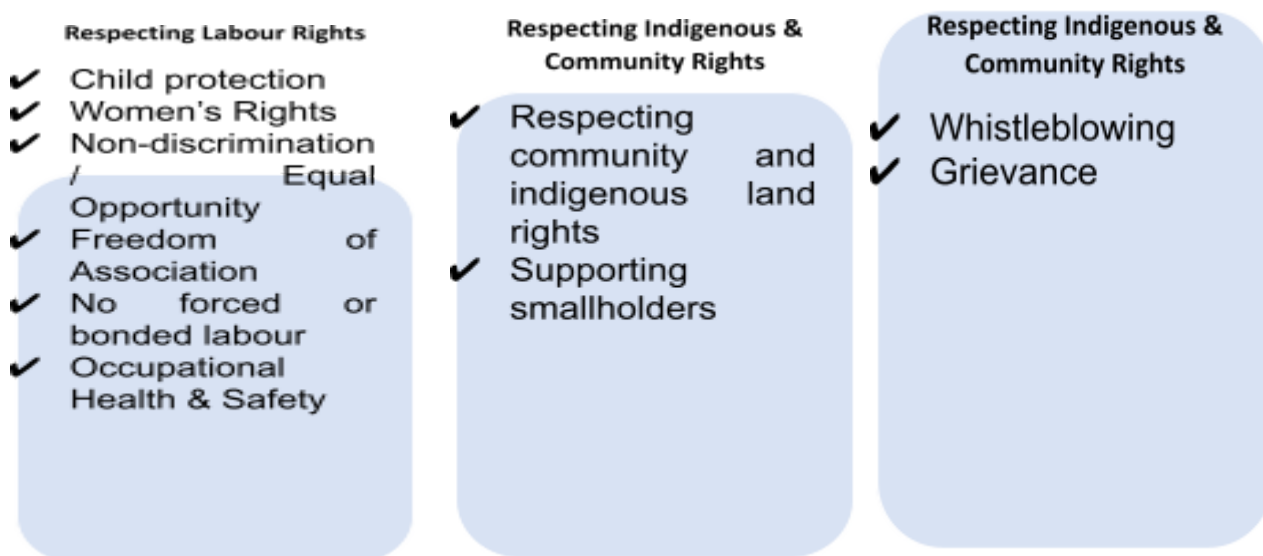
AEP respects and supports the Universal Declaration of Human Rights and all workers' rights. This document is based on the United Nations (UN) Guiding Principles on Business and Human Rights framework, encompassing the three pillars of “Protect, Respect, and Remedy” and promoting human rights. We use this framework to guide the development and implementation of our policies, action plans, and mechanisms.

This framework focuses on the following key areas of (1) Labour Rights, and (2) Indigenous and Local Community Rights, and is supported by the following:

- Our policies and statements on key human rights aspects, notably:
 - No Deforestation, No Peat, and No Exploitation Policy (NDPE)
 - Human Rights Policy
 - Equal Opportunity Policy
 - Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy
 - Child Protection Policy
 - Women’s Charter
 - Grievance Procedure
 - Whistleblowing Policy
 - UK Modern Slavery Act Transparency Statement
- Due diligence mechanisms to identify, prevent, mitigate, and account for our human rights impacts
- Systems to receive, process, monitor, and remediate any adverse human rights impacts
- Through our sustainability commitments, we are also committed to promoting and ensuring the protection of human rights within our supply chain.

Finally, we consult and engage with human rights experts and civil society organizations to help provide oversight and to help ensure feedback is received for the continuous improvement of our human rights initiatives.

Key focus areas for Human Rights



Respecting Labour Rights

We commit to ensuring that the rights of all people working in any of our operations are respected according to local, national and ratified international laws. We also commit to ensuring international best practice where legal frameworks are not yet in place.

Policy Statement	Our Approach
No Exploitation – Forced Labour AEP and its suppliers and sub-contractors shall not knowingly use or promote the use of forced or bonded labour or human trafficking and shall take appropriate measures to prevent the use of such labour in connection with their activities. The company shall employ remedial actions in the case that such labour or trafficking is uncovered to ensure that victims are referred to the existing services for support and assistance.	- Standardized employment contracts - Voluntary overtime - Ethical recruitment - Decent living condition - Freedom of movement - No unlawful deductions - Access to remedy with no reprisals - Post arrival orientation - UK Modern Slavery Act Transparency
No Exploitation – Freedom of Association We respect the rights of personnel to form and join trade unions of their choice, and bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, parallel means of independent and free association and bargaining should be made available to all such personnel.	- Alternative representation for operating units where no unions operate - No interference policy and ensuring independence of labour unions - Regular periodic meetings between management and union leaders to discuss any matters pertaining to union members and workers in general

Policy Statement	Our Approach
Child Protection AEP does not tolerate child labour, any forms of child exploitation, and child abuse.	- Access to education - Access to childcare facilities - Strict age-verification and other relevant procedures to ensure no underaged workers - Remediation to child labour - Child-friendly and safe environment - Contractors' audit to ensure there is no child labour.
Occupational Health and Safety AEP takes moral and legal responsibility for people's health and safety and commits to providing a safe and healthy environment for its employees, contractors, and visitors in all aspects of its operations.	- Certification & inspections (e.g. Indonesian Sustainable Palm Oil (ISPO), ISO 14001:2015, ISCC) - Assessments (e.g. Hazard Identification, Risk Assessment & Risk Control; Chemical Health Risk Assessment) - Medical and healthcare - Free Personal Protective Equipment and Health & Safety training - Prevention of accidents

HUMAN RIGHTS COMMITMENT

	- Safe environmental conditions
Non-Discrimination/ Equal Opportunity We are committed to providing equal opportunity to all employees, we will not discriminate in hiring, promotion, or retirement. We ensure a diverse and representative workforce profile through the promotion of employment equality.	- Human Resources hiring procedure process based on merit - Training for internal educational improvement for staff - Post-arrival orientation - Non-discrimination training - Maternity protection - Increasing number of permanent workers
AEP Gender Committee Policies on Sexual Harassment, Violence and Abuse, and respect for Reproductive Rights - To provide conducive working environment that is characterized by equality and mutual respect. - To take all reasonable measures to prevent such incidents and deal promptly and fairly with any reports of sexual harassment in a confidential and discreet manner.	- Trainings for workers and management - Specific and confidential channel for sexual harassment Complaints/grievances - Women's committee - Women's healthcare - Childcare services

Respect for Community and Indigenous Rights

AEP respects tenure rights and recognizes the long-term customary and individual rights of indigenous and local communities. The engagement of local communities is critical to ensuring that Free, Prior and Informed Consent (FPIC) processes are correctly implemented and continuously improved. The development of the local community, particularly smallholders, is important to ensure that there are shared benefits and value in the area in which we operate, whilst ensuring sustainability.

We recognize that we need to work on supporting compliance for smallholders outside of meeting certification requirements. We are currently formulating new approaches in consultation with stakeholders.

Policy Statement	Our Approach
No Exploitation – Community Development, Land Rights and Community Rights - Respect Land Tenure Rights - Respect the Rights of Indigenous and Local Communities to give or withhold their Free, Prior and Informed Consent (FPIC) to Operations on Lands to which They Hold Legal, Communal or Customary Rights	- FPIC prior to new development - Land acquisition and land legalizing through due legal process - Due diligence for new acquisition - Plan to review of existing internal operations regarding social conflict between AEP and communities - Systematic approach for land claim resolution - Community development opportunities explored with the local communities

HUMAN RIGHTS COMMITMENT

	- Supporting smallholder farmer communities that supply to AEP mills, including certification support
No Exploitation – Supporting Smallholders - Facilitate the inclusion of smallholders into the supply chain - Provide technical assistance and support to smallholders	- Support smallholders in achieving nationally mandated sustainable certification including efforts to improve livelihoods, and where viable for the smallholder, ISPO certification. - Where smallholders are direct suppliers to AEP, support for NDPE compliance is provided

Protecting the Right to Raise Grievance and the Right to Remedy

We recognize that feedback and input from stakeholders are valuable because it helps to enhance transparency and provides a means to gauge progress on implementation of our commitments and policies. We encourage feedback on our own implementation as well as that of our suppliers.

AEP maintains a clear and strong commitment to non-violence and will do whatever possible, in all contexts, to prevent the use of force or the threat or real application of violence, and to ensure that parties adversely impacted by our operations and practices have access to remedy.

Policy Statement	Our Approach
Whistleblowing, Human Rights Defender Policy - Provides proper avenues to raise concern about actual or suspected improprieties in matters of financial reporting or other matters and receive feedback on any action taken - Aims to assure all affected parties that such acts will be protected from reprisals or victimization for whistleblowing in good faith	- Receive and act on any reports, with no reprisal - Providing a direct and more immediate means for workers to raise grievances with the option of anonymity - Providing access to remedy with no reprisal
Grievance Procedure - AEP commits to handle any grievance from any external parties, including individuals, government organizations and non-governmental organizations (NGOs) concerning the implementation of the NDPE Policy. - The Grievance Procedure favors open and inclusive dialogues with stakeholders over complex administrative processes.	- Receive and act on any reports - Providing a direct means of raising grievance for any stakeholder, including anonymously - Providing access to remedy with no reprisal for complainants where grievances have been verified as correct - Identifying corrective actions and remediation processes for verified issues and grievances within the relevant operations

Ensuring Effectiveness

To ensure the effectiveness and continuous improvement of the strategies, approaches, and actions we have put in place, we will continue to do the following:

- Periodic review of NDPE policy and relevant policies, incorporating feedback and consultation with Human Rights civil societies, NGOs, government, and stakeholders.
- Participation in multi-stakeholder collaborations to promote and pursue key human rights principles
- Involvement in pre-competitive collaboration with peers to continuously improve on industry best practice