

RASAD NIGERIA LIMITED

POLICY 03

Human Rights and Labour Policy

VERSION	Version 1 · September 2026
POLICY OWNER	HR Lead
APPROVED BY	Board of Directors, Rasad Nigeria Limited
REVIEW	Annually

1. Why this policy exists

Rasad is built on work done by people: farmers, drivers, loaders, graders, warehouse teams, field agents and office staff. This policy states how we treat them and what we expect from everyone we do business with.

2. Scope

This policy covers all Rasad directors, employees, casual and seasonal workers, and contractors in Nigeria and Benin Republic. It also sets our expectations for suppliers, hauliers, service providers and other business partners. Those expectations are set out in more detail in the Supplier Code of Conduct (Policy 08).

3. Our commitments

We respect internationally recognised human rights, as set out in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We follow the UN Guiding Principles on Business and Human Rights. We comply with the Constitution of the Federal Republic of Nigeria, the Labour Act, the National Minimum Wage Act, the Employee's Compensation Act 2010, the Nigeria Data Protection Act 2023, and the laws of Benin Republic where we operate there. Where standards differ, we apply the higher one.

4. Standards we apply

4.1 No forced labour

- All work is voluntary. Workers may leave with reasonable notice.
- We never hold identity documents, wages or deposits to keep someone at work.
- We never charge recruitment fees, and we do not allow agents to charge them.
- We do not use trafficked, bonded or prison labour.

4.2 No child labour

We do not employ anyone under 18. Our approach in the supply chain is set out in Policy 02.

4.3 Fair pay and hours

- Everyone earns at least the national minimum wage, paid on time and in full, with a clear payslip.
- Deductions are made only where the law allows them and are explained in writing.
- Normal working hours follow the law and the employment contract. Overtime is voluntary, recorded and paid.
- Every worker gets at least one day off in seven, rest breaks and paid leave in line with the law.
- Seasonal and casual workers receive the same pay rate as permanent staff doing the same job.

4.4 Written terms

Every employee receives written terms of employment in a language they understand. The terms cover the job, pay, hours, leave and notice. Casual workers receive a written summary of their pay rate and hours.

4.5 Equal treatment

We hire, pay, train and promote people on merit. We do not discriminate on the grounds of sex, ethnicity, religion, state of origin, disability, pregnancy, marital status, HIV status, age or political opinion. Women and men receive equal pay for work of equal value. We actively open roles in field, warehouse and management work to women and young people.

4.6 Dignity and respect

Harassment, sexual harassment, bullying, threats and physical or verbal abuse are not tolerated. Discipline is fair, documented and never involves physical punishment or fines.

4.7 Freedom of association

Workers may join or form a trade union and bargain collectively. No one is penalised for doing so. Where union representation is absent, we hold regular worker meetings so that concerns can be raised collectively.

4.8 Health and safety

Every worker has the right to a safe workplace and to stop unsafe work without penalty (see Policy 05).

4.9 Privacy

Personal data about workers, farmers and communities is collected only for a clear purpose, stored securely and handled in line with the Nigeria Data Protection Act 2023.

4.10 Communities and land

We respect the rights of communities affected by our operations, including their land rights and access to water. We consult them before activities that affect them (see Policy 06).

5. Due diligence

We identify and assess human rights risks in our operations and supply chain at least once a year. We prioritise the most severe risks, act to prevent or reduce them, track results and communicate what we have done. When we have caused or contributed to harm, we provide or support remedy.

6. Speaking up

Workers and others can raise concerns in confidence through our grievance channels (Policy 07). Retaliation against anyone who raises a concern in good faith is itself a serious breach of this policy.

7. Roles and responsibilities

Role	Responsibility
Board of Directors	Approves this policy and oversees human rights risks.
Managing Director	Accountable for implementation.
HR Lead	Owns this policy, contracts, payroll compliance, training and worker grievances.
Line managers	Apply this policy daily and act on concerns.
Operations and Procurement Lead	Makes sure suppliers and hauliers meet Policy 08.

8. Monitoring and reporting

We track headcount by gender and age group, wage compliance, overtime, accidents, grievances raised and resolved, and training completed. We report these figures to financiers as part of our social indicators and publish a summary each year.

9. Breaches

Breaches lead to disciplinary action up to dismissal and, where the law is broken, a report to the authorities. Business partners who breach this policy face corrective action or termination.

10. Related policies

Policy 02 Child Labour Prevention and Remediation · Policy 05 Health and Safety · Policy 06 Community Engagement · Policy 07 Grievance Redress and Whistleblower Reporting · Policy 08 Supplier Code of Conduct