	<b>SOCIAL ACCOUNTABILITY POLICY</b>	Document Code	<b>COM-QP-009</b>
		Issue Date	<b>25.04.2022</b>
		Revision Date/No	--
		Page Number	<b>1/4</b>

“**GCL International Bulgaria**” Ltd. (“the Company”) is committed to comply with the United Nations Declaration of Human Rights and by adopting the International Labour Organisation (ILO) guidance for all employees and stakeholders (i.e. shareholders, employees, partners, government, NGOs, charities, communities etc.)

The Company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.

### **FREEDOM OF ASSOCIATION (FOA)**

Workers, employees, and direct contractors, without distinction, have the right of Freedom of Association and to join or form trade unions of their own choosing, which includes bargaining collectively.

No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment as a result of joining, or failing to join, any such organisation.

The Company shall maintain an open attitude towards the activities of trade unions, including ensuring no discrimination against worker representatives.

### **ACCEPTABLE WAGES**

The Company is committed to ensuring all persons are paid a fair wage that is compliant with local minimum wage legislation, providing levels that allow for housing and sustenance.

The deliberate withholding of agreed salaries for work undertaken is not permitted within the organisation. No deduction shall be taken for staying in employment contrary to law. Moreover, no deduction shall be made for work-related items.

In line with the company’s policies, there shall be no discrepancy in wages for job roles on account of gender or any other non-competence/non-geographic based factors.

Employees shall be paid into their own accounts or shall be in control of their own bank accounts.

### **WORKING HOURS**

All offices within The Company shall ensure that the hours worked by personnel is compliant to contractual requirements, local legislative requirements and importantly is safe. Workers shall be paid for



## SOCIAL ACCOUNTABILITY POLICY

Document Code	COM-QP-009
Issue Date	25.04.2022
Revision Date/No	--
Page Number	2/4

overtime work as per local legislative requirements. Moreover, no Illegal or improper use of overtime for all workers including specific categories of workers such as pregnant or young, etc.

Due care must be taken by management and personnel alike to ensure that hours meet such compliance obligations and take levels of fatigue do not threaten the safety of the individual and those around them.

Where possible work performed shall be on the basis of recognised employment relationship established through national law and practice or agreed contract basis.

### REGULAR EMPLOYMENT

Workers should be aware of the terms and conditions of their employment or engagement from the outset. In particular workers must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Probation periods shall not be excessive and contrary to law.

No bonding contract or “abused” temporary contract shall be signed with either full-time or subcontract employees.

Workers should not require paying deposits during their recruitment process in contrary to the law and paying fees upon termination of employment. Moreover, employees shall not required to sign blank resignation letters.


Workers should also be allowed such annual leave, sick leave, maternity / paternity leave, and such other leave as is granted by legislation as a minimum.

It is the Company’s obligation to register all workers complying with all local legislations such as social security, provident fund, inland revenue or federal taxation etc.

### NON-DISCRIMINATION

The Company shall practice no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

All workers should be treated equally. Workers with the same experience and qualifications should receive equal pay for equal work.

	<b>SOCIAL ACCOUNTABILITY POLICY</b>	Document Code	<b>COM-QP-009</b>
		Issue Date	<b>25.04.2022</b>
		Revision Date/No	--
		Page Number	<b>3/4</b>

## **PROVISION OF WELFARE EQUIPMENT & FACILITIES**

In line with the company's Health, Safety Policy, the company are dedicated to protecting its personnel when performing their activities, keeping them safe and maintaining the health.

All staff shall have access to suitable welfare facilities when working within The Company facilities such as offices and workshops. These include access to adequate like clean water, sanitary resources (toilets, sinks etc.) and health and safety equipment (first aid kits, fire extinguishers, PPE etc.).

## **NO CHILD LABOUR**

The Company believes that the exploitation of children is abhorrent and counterintuitive to our beliefs as a company that all peoples deserve basic human rights, such as access to education. As such, all offices are required to abide by local legislation relating to minimum working/school leaving age, with any noted non-compliance to this being dealt with swiftly by the management at all levels.

This is not to be confused with Work Experience, Internship or Apprenticeship programs designed to provide young person valuable experience. Such programs shall be undertaken in a formalized manner that ensures the welfare of the individuals concerned.

## **NO HARSH OR INHUMANE TREATMENT**

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited within The Company and its partners.


## **NO MODERN SLAVERY & HUMAN TRAFFICKING**

The Company and all its offices are committed to supporting the elimination of Modern Slavery and fully meet its obligations under all relevant legislative requirements (e.g. Modern Slavery Act 2015 in the UK).

The Company deplores the act of enslaving and trafficking people and any perceived notion of such activities taking place.

## **EMPLOYMENT IS FREELY CHOSEN**

The Company shall ensure that there is no forced, bonded or involuntary prison labor within its direct operations, partners and its direct tier supply chain suppliers.

	<b>SOCIAL ACCOUNTABILITY POLICY</b>	Document Code	<b>COM-QP-009</b>
		Issue Date	<b>25.04.2022</b>
		Revision Date/No	--
		Page Number	<b>4/4</b>

Workers shall not be required to lodge any deposit, financial or otherwise, and shall not be required to deposit their identity papers allowing them to leave the contracted employment after a reasonable notice period.

Practices designed at restricting personal freedom and movement such as the withholding of passports, visas or work permits are not permitted amongst any of the offices of The Company.

Any perceived notion of such activities taking place, either during operations or by The Company personnel shall be tackled in a swift and comprehensive manner.

**All personnel should take it as part of the moral duty to report any such activities to the Whistleblowing channel ([www.gcl-intl.bg](http://www.gcl-intl.bg)) immediately.**

**The Company will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation's activities.**

**With relation to the topics covered within this policy, The Company shall cooperate fully with law enforcement agencies in any investigation into any events of malpractice or criminal behavior.**