TROJAN
CONSTRUCTION GROUP

HUMAN RIGHTS POLICY

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Human Rights Policy

Introduction

The Human Rights Policy (the Policy) outlines guidelines of Trojan Construction Group – Sole Proprietorship LLC (TCG) and its subsidiaries (henceforth referred to as the Group) on treating people with integrity, respect, and fairness.

Scope

This Policy applies to TCG, and its subsidiaries that do not have existing related policies suitable to their operations. The Policy applies to all areas of the Group's business operations, covering all directors, executives, and employees working for or on behalf of the Group. It also extends to outsourced or seconded employees working exclusively for or on behalf of the Group. This Policy applies to TCG's subsidiaries and affiliate companies however, subsidiaries and affiliate companies are encouraged to define their respective human rights policies aligned with their core values. TCG also endeavours to encourage external parties (vendors/suppliers, contractors, service providers etc.) working with TCG to adopt similar policies per TCG's Supplier Code of Conduct.

Policy Statement

TCG is committed to respecting human rights. TCG is a proponent of the human rights and labour principles of the United Nations Global Compact (UNGC), and the International Labour Organization (ILO) conventions on human rights. TCG operates within the legal framework of the host country of its operations and acknowledges the importance of fostering a workplace environment that values human rights, respect, employee engagement, fairness, and collaboration. TCG promotes employee welfare and engagement, within the bounds of local regulations.

Non-discrimination and Equal Opportunity

TCG does not tolerate discrimination based on race, colour, religion, gender, age, disability, or any other status protected by applicable law, and fosters a workplace free from discrimination and abuse. TCG ensures fair treatment, equality of opportunity, and safe living and working conditions for employees. TCG strives to uphold equal pay for men and women performing work of equal value.

Labour Rights and Fair Employment

TCG complies with labour rights and fair employment practices in accordance with laws and regulations in locations where TCG operates. TCG prohibits forced and compulsory labour, acquired through modern slavery or human trafficking, in employment. TCG prohibits the employment of children below the minimum age. TCG provides rights to maternity leave, paternity leave, health protection, and non-discrimination for employees during and after pregnancy. TCG provides that part-time employees receive equitable treatment and benefits comparable to full-time employees.

Stakeholder Engagement

TCG fosters relationships with stakeholders to better understand human rights concerns and endeavours to integrate such considerations into this Policy.

Training and Awareness

TCG promotes the training and development of its employees to empower them with the knowledge and skills they need to champion human rights. TCG further promotes awareness and an understanding, amongst employees, of how human rights impact its operations and how the company's operations impact stakeholders.

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Compliance
TCG complies with the applicable laws and regulations of the UAE and/or the applicable laws and regulations of the host country of its operations. For the avoidance of doubt, subsidiaries registered and operating in countries other than the UAE are mandated to adhere to the laws of the host country in addition to the applicable laws of the UAE. TCG remains unequivocally compliant with UAE laws.

Roles and Responsibilities
In general, all employees should uphold principles as set forth in this Policy.

Reporting and Transparency
TCG encourages stakeholders to report concerns, suspicions, or potential violations of this Policy.

Policy Review
TCG will review and revise this Policy periodically if required so that it remains up-to-date and aligned with the company's core values, laws and regulations of the United Arab Emirates (UAE), and with global best practices. TCG shall make available this Policy and future amendments to directors, executives, and employees.

This Policy was last reviewed in September 2023.