



FNRCO MODERN SLAVERY POLICY

Revision # 1 – December 14, 2022

Mohammed Faisal

Reviewed By

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14 January 2022

Date

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Ali Jaber Al Mahan

Approved By

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10 January 2023

Date

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	FNRCO Modern Slavery Policy	Doc Ref No.	Rev No.
		FNRCO – EH&S – 01 1222	01

Policy Statement

First National Human Resources Company (FNRCO) is unequivocally committed to conducting business in a manner that respects human rights and is free from modern slavery and human trafficking. This Modern Slavery Policy is a cornerstone of our broader HR policy, underlining our resolve to identify, prevent, and mitigate any instances of modern slavery within our operations and supply chain. FNRCO recognizes modern slavery as a grave violation of human rights and is dedicated to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our business or our supply chains.

Scope

This policy applies to all persons working for or on behalf of FNRCO in any capacity, including employees, directors, officers, agency workers, contractors, consultants, third-party representatives, and business partners.

Procedures

1. Risk Assessment and Due Diligence

- Conduct thorough risk assessments to pinpoint potential modern slavery risks within our operations and supply chains.
- Enforce due diligence measures for FNRCO's operations and our suppliers, promoting compliance with this policy.

2. Training and Awareness

- Provide specialized training to employees, especially those in supply chain management, to recognize and address modern slavery risks.
- Elevate awareness regarding the severity of modern slavery and human trafficking through educational materials, aiming to foster a vigilant and informed workforce.

3. Reporting and Whistleblowing

- Empower employees to report concerns or suspicions regarding modern slavery practices within our business or supply chains.
- Maintain a confidential whistleblowing channel, assuring non-retaliation and respectful handling of all reports.

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4. Supplier Code of Conduct

- Mandate adherence to FNRCO’s Supplier Code of Conduct, which explicitly prohibits forced, compulsory, trafficked labor, or anyone held in conditions of slavery or servitude.
- Integrate modern slavery assessments into supplier selection, onboarding, and performance evaluation processes.

5. Compliance and Enforcement

- Systematically monitor adherence to this policy within FNRCO and among our suppliers.
- Implement strict remedial actions for non-compliance, potentially culminating in the termination of business relations with offending suppliers.

6. Policy Review

- This policy is subject to an annual review and update process to assure ongoing relevance and efficacy, in line with legal standards and best practices.

Declaration

By instituting this Modern Slavery and Anti-Slavery Policy, FNRCO reiterates its dedication to ethical business conduct and the protection of human rights. We expect unwavering compliance with this policy from all our employees and partners, united in our effort to eliminate modern slavery and foster an ethical, transparent, and responsible business environment.