



Orion Rail Construction Policy Statements

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12 Human Rights Policy

We support the principles of the universal declaration of human rights as goals to which all should aspire.

In the normal course of our business we are offered from time to time the opportunity to undertake projects in territories where it can be demonstrated or might be argued that the principles of the declaration are not fully adhered to. Indeed, there are a few countries where practices may still be so very far distant from these principles that we are, in principle, not prepared to operate there at all.

In other countries, where compliance with the declaration is still imperfect but where progress is nevertheless being made, in carrying out work under our control we will ourselves strictly observe those fundamental rights set out in the declaration which are relevant to our operations and will not connive in their breach by partner or similar associated parties. These rights include such obvious matters as cruel and inhuman treatment, the use of slavery or child labour, among others.

We will also conduct a pre-assessment of the potential human rights impact of any project or planned permanent business activity as part of the project / investment evaluation process already built into the company's Management control systems. One basic test is whether our operations contribute to or benefit from breaches of the declaration. During the evaluation process we will, where appropriate, take external advice and during execution ensure that, where necessary, managers have the expertise and resources to deal with the practical implications of human rights issues.

We make our policy and position clear to our employees/contractors, and they are required to consult senior Management when in doubt. The board regularly monitors compliance with our policy.

Sam Dcruze
Rail Managing Director
8th September 2020