

# Human Rights Policy



Mutual trust and client/contractor confidence are fundamental to our business. They take a long time to build up and can be lost very quickly. Everyone in the business, irrespective of level, has a responsibility to behave and carry out business in the right way.

Our corporate values are here to underpin these behaviours and enable us to remain:

- Dependable and do the right thing;
- Open to different ideas and cultures;
- Connected to our clients, community and each other.

### Commitment

We conduct our business in a manner that respects the human rights and dignity of all people.

Our Human Rights Policy is guided by internationally-recognised human rights, as set out in the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

This policy applies to our whole business and all employees within our business. We expect our clients, suppliers and partners to uphold our values and adopt similar Human Right Policies within their business or agree to adopt ours.

## Our Values

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Growth



Excellence



Life



Integrity

## Governance

The Airswift Operations Board are responsible for fostering a culture of integrity and respect for human rights, the Business Ethics Officer is the owner of this policy and responsible for reporting all matters to the Operations Board, as appropriate.

## End-User/Consumer Rights and Safeguards

We recognise that our end-users, including job seekers, clients, and other stakeholders, have the right to expect ethical practices and transparency in all aspects of our operations. Our commitment to human rights extends beyond our employees and contractors to all individuals who interact with our services. We uphold the following principles in our dealings with end-users:

- Data Privacy and Protection - we are committed to respecting and protecting the privacy of our end-users. All personal information collected, processed, and stored is handled in compliance with applicable privacy laws and regulations, ensuring confidentiality and security at every stage.
- Fair and Transparent Recruitment Practices - we ensure that our recruitment services are conducted ethically, with clear and transparent processes for candidates.
- Non-Discrimination - we are committed to providing equal opportunity services and prohibit any discrimination based on race, ethnicity, gender, age, disability, religion, or any other protected status in the recruitment process.

## Engagement with End-Users on Human Rights Matters

To support a culture of trust and transparency, we are dedicated to actively engaging with our end-users regarding human rights matters. We adopt the following approach:

- Feedback and Grievance Mechanisms - we provide clear channels for clients, contractors and candidates to raise concerns or report issues related to human rights. This includes:
  - \* A dedicated email for reporting grievances or human rights concerns confidentially with our Business Ethics Officer
  - \* We use monthly surveys to gauge client and contractor satisfaction.
  - \* Clear escalation processes to ensure timely and thorough investigation of all reported issues.
- Transparency and Communication - we are committed to informing end-users about our human rights practices and any relevant up-

dates or changes. This includes:

- \* Regularly updating our website and other communication channels with information about our human rights commitments, policies, and improvements.
- \* Providing clear, accessible information about our human rights policy during the onboarding process for new clients and candidates.

## Ethical Recruitment

Airswift are committed to ethical and legal recruitment of employees and contractors. This means that recruitment is free from discrimination involuntary labour, slavery, and trafficking. Our Internal Recruitment and Selection Policy and Contract and Permanent Recruitment Procedures detail the steps that Airswift take to hire someone in an ethical way. We will never request payment of fees in order to allow someone to work.

## Employment

Employment contracts are transparent and agreed upon in writing prior to commencing work, in a language that is understood by the worker. Workers are free to refuse their contract; cancel and change their employment; and, where appropriate, return home travel at the end of their employment contract will be provided.

Airswift will never withhold access to passports and personal documentation or make unlawful wage deductions. Neither will we charge workers for employment or any service in relation to the execution of the employment.

Workers shall have freedom of movement outside normal working hours, unless there are legitimate safety or security issues that might threaten the health, safety, or well-being of the worker.

## Working Conditions

Airswift abides by all applicable laws and regulations regarding wages, work hours, and overtime. Workers are paid their agreed wages regularly and on time. Workers will receive all benefits to which they are entitled in accordance with contractual arrangements.

## Non-Discrimination

Airswift is committed to promoting equal opportunities in employment. Employees will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation.

The following forms of discrimination are prohibited

under the Airswift Equal Opportunities Policy and are unlawful: direct discrimination, indirect discrimination, harassment, victimisation, and disability discrimination.

### **Modern Slavery & Human Trafficking**

We are committed to ensuring that Airswift does not engage in any form of forced labour, modern slavery or human trafficking. Our Modern Slavery & Human Trafficking Statement and Procedure provide more detail regarding this.

### **Safe Working Environment**

Airswift are committed to providing a safe workplace for all employees. We have in place an Office Safety Policy and Physical and Environmental Security Procedure which outline the steps taken to ensure that this is fulfilled.

### **Child Labour & Young Workers**

Airswift prohibits the employment of anyone under the age of 15 and for any young workers under the age of 18 to be employed in hazardous work or night work. We carry out background checks on all employees which include verification of age, identify and right to work during the hiring process.

### **Freedom of Association and Collective Bargaining**

Airswift respects our employee's right to freedom of association, whereby they can freely form and join unions and to engage in collective bargaining. We will not interfere with the independence of unions and will not discriminate against workers because of their union membership or activities.

### **Grievance Mechanisms and Disciplinary Procedures**

The Company is committed to dealing responsibly, openly and professionally with all genuine concerns about possible unacceptable business/personal conduct. All Airswift employees (whether they are employed directly by Airswift or as contracted staff) and associates are empowered to bring to the attention of management any issues or areas of concern.

Full details of how to raise any concerns are outlined in the Code of Business Ethics.



[airswift.com](http://airswift.com)