

SOCIAL AND HUMAN RIGHTS POLICY

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1. Purpose

To ensure that all project activities are carried out in a safe, ethical, lawful, and socially responsible manner while promoting the wellbeing, dignity, and rights of employees, contractors, local communities, and other stakeholders affected by project operations.

This policy is aligned to International Labour Organization's (ILO) core labour standards, known as **Fundamental Principles and Rights at Work** including:

- **Freedom of Association and Collective Bargaining:** Protects the rights of workers and employers to organize and negotiate, supported by Conventions 87 and 98.
- **Elimination of Forced Labour:** Prohibits all forms of coerced labor, including trafficking and bonded labor, under Conventions 29 and 105.
- **Abolition of Child Labour:** Sets minimum working ages and bans the worst forms of child labor via Conventions 138 and 182.
- **Elimination of Discrimination:** Ensures equal opportunity and treatment in employment, covering areas like race, gender, and religion, per Conventions 100 and 111.
- **Safe and Healthy Environment:** Recognizes safety at work as a fundamental right through Conventions 155 and 187.

2. Policy Objectives

The objectives of this policy are to:

- 1) Promote fair, lawful, and ethical employment practices.
- 2) Ensure safe and healthy working conditions for all workers.
- 3) Foster harmonious relationships with local communities.
- 4) Encourage local content and community participation.
- 5) Prevent discrimination, harassment, exploitation, and abuse.
- 6) Promote gender equality and inclusion.
- 7) Protect employee rights and dignity.
- 8) Ensure compliance with Ugandan labor laws and client requirements.
- 9) Establish clear grievance and conflict resolution mechanisms.
- 10) Minimize social disruption and negative impacts on host communities.

3. Scope

This policy applies to:

- a) Permanent employees
- b) Temporary workers
- c) Casual laborers
- d) Subcontractors
- e) Consultants
- f) Site visitors

- g) Security personnel
- h) Suppliers operating within project areas

The policy shall apply to all personnel involved in conducting different projects at Japotech including but not limited to:

- 1) Fiber optic infrastructure works
- 2) Telecom equipment installation
- 3) Internet link installation
- 4) Power and lighting pole installation
- 5) Site civil works (fiber, tower construction, etc)
- 6) Equipment transportation and logistics

4. Guiding Principles

Japotech shall conduct all operations based on the following principles:

4.1 Respect for Human Rights

All workers and community members shall be treated with dignity, fairness, and respect.

4.2 Non-Discrimination

Employment decisions shall not discriminate based on:

- a) Gender
- b) Tribe
- c) Religion
- d) Political affiliation
- e) Disability
- f) Age
- g) Nationality
- h) Marital status

4.3 Safety First

No task shall be performed unless it can be executed safely.

4.4 Community Partnership

Japotech shall work collaboratively with local leaders, communities, and stakeholders.

4.5 Accountability

All staff shall be accountable for their conduct and professional behavior.

5. Human Resource Policy

5.1 Recruitment and Employment

Japotech shall:

- 1) Promote transparent recruitment procedures.
- 2) Prioritize competent and qualified personnel.
- 3) Encourage employment of local residents where feasible.
- 4) Ensure all workers receive written contracts or appointment letters.
- 5) Maintain employee records and documentation.

No forced labor or child labor shall be tolerated.

Minimum employment age shall comply with Ugandan labor laws.

5.2 Local Employment and Capacity Building

Where skills are available locally, Japotech shall:

- a) Recruit local labor from the communities where work shall be executed.
- b) Offer technical training and mentorship opportunities.
- c) Promote skills transfer to local workers.
- d) Encourage apprenticeship and internship programs.

5.3 Working Hours and Leave

Working hours shall comply with national labor regulations.

Employees shall be entitled to:

- 1) Rest breaks
- 2) Weekly rest days
- 3) Annual leave of 21 working days
- 4) Sick leave
- 5) Maternity and paternity leave where applicable

5.4 Employee Welfare

Japotech shall provide:

- a) Safe accommodation where required
- b) Clean drinking water
- c) Adequate sanitation facilities
- d) First aid and medical support
- e) Reasonable rest facilities
- f) Transportation arrangements where applicable

The company shall maintain a zero-tolerance approach to inhumane treatment.

5.5 Code of Conduct

All workers shall:

- 1) Behave professionally and respectfully.
- 2) Respect local customs and traditions.
- 3) Avoid abusive language and violence.
- 4) Avoid alcohol and drug abuse on duty.
- 5) Protect company property.
- 6) Maintain ethical conduct.

The following are strictly prohibited:

- a) Sexual harassment
- b) Exploitation
- c) Theft
- d) Fighting
- e) Corruption and bribery
- f) Possession of illegal substances
- g) Gender-based violence

Violations may lead to disciplinary action or termination.

6. Community Relations Policy

6.1 Community Engagement

Japotech shall:

- 1) Engage local leaders before project commencement.
- 2) Inform communities about planned activities.
- 3) Maintain open communication channels.
- 4) Address community concerns respectfully and promptly.

6.2 Respect for Local Culture

All employees shall:

- a) Respect local cultural practices.
- b) Avoid actions that may offend communities.
- c) Dress appropriately when interacting with local residents.

6.3 Community Health and Safety

The company shall:

- 1) Control dust, noise, and traffic disruptions.
- 2) Install warning signs and barriers.
- 3) Ensure safe movement of machinery and vehicles.

- 4) Prevent public exposure to hazardous work areas.

6.4 Grievance Redress Mechanism

Japotech shall establish a grievance system allowing workers and community members to:

- a) Report complaints confidentially
- b) Raise concerns without retaliation
- c) Receive timely investigation and resolution

Complaints may relate to:

- 1) Worker treatment
- 2) Noise and disturbances
- 3) Property damage
- 4) Safety concerns
- 5) Misconduct by employees

All grievances shall be documented and tracked.

7. Health, Safety, and Wellbeing

7.1 Occupational Health and Safety

Japotech shall:

- a) Conduct risk assessments before activities.
- b) Provide mandatory PPE.
- c) Conduct toolbox talks and safety briefings.
- d) Train workers in emergency response.
- e) Maintain incident reporting procedures.

7.2 Medical Preparedness

The company shall:

- 1) Maintain first aid kits on all sites.
- 2) Provide access to medical evacuation where necessary.
- 3) Ensure emergency contacts are displayed.
- 4) Encourage malaria prevention and hygiene awareness.

7.3 Mental Health and Fatigue Management

Given the remote nature of operations, Japotech shall:

- a) Encourage adequate rest periods.
- b) Monitor worker fatigue.
- c) Promote respectful team culture.
- d) Provide reasonable communication access to families.

8. Gender Equality and Inclusion

Japotech is committed to:

- 1) Equal employment opportunities
- 2) Fair treatment of women in technical and leadership roles
- 3) Safe working conditions for female employees
- 4) Prevention of sexual harassment and exploitation

Separate sanitation facilities shall be provided where feasible.

9. Environmental and Social Responsibility

Workers shall:

- a) Avoid environmental pollution
- b) Dispose of waste responsibly
- c) Prevent damage to community land and property
- d) Respect protected areas and wildlife

Japotech shall restore disturbed areas where practicable.

10. Security Management

Security operations shall:

- 1) Respect human rights
- 2) Avoid excessive force
- 3) Protect workers, equipment, and community safety

Security personnel shall act professionally at all times.

11. Disciplinary Procedures

Any employee violating company policy may face:

- a) Verbal warning
- b) Written warning
- c) Suspension
- d) Termination
- e) Legal action where applicable

All disciplinary actions shall follow fair procedures.

12. Training and Awareness

Japotech shall conduct regular training on:

- a) Occupational health and safety
- b) Human rights
- c) Community relations
- d) Code of conduct
- e) Emergency response
- f) Gender sensitivity
- g) Environmental awareness

13. Implementation and Monitoring

Project managers and supervisors shall ensure compliance with this policy.

Regular inspections, audits, and reviews shall be conducted to:

- 1) Monitor implementation
- 2) Identify gaps
- 3) Improve performance

Non-compliance shall be addressed promptly.

14. Policy Review

This policy shall be reviewed periodically or when:

- 1) Legal requirements change
- 2) Client requirements are updated
- 3) Operational risks change
- 4) Significant incidents occur