



GLF
HUMAN RIGHTS POLICY

Policy Control	
VERSION NO	0
SUMMARY OF CHANGE	First Issue
PERSON RESPONSIBLE FOR THE POLICY	GLF Board of Directors
GLF APPROVAL AND DATE	05 November 2024
VALID FROM	05 November 2024
DISTRIBUTION	For Internal Use

Table of Contents

1. INTRODUCTION.....	3
2. PURPOSE	3
3. SCOPE	3
4. DEFINITION	3
5. PRINCIPLES	4
6. COMMITMENTS	4
7. HUMAN RIGHTS DUE DILIGENCE APPROACH.....	5
8. IMPLEMENTATION, MONITORING AND REMEDIATION	6
8.1 IMPLEMENTATION	6
8.2 MONITORING	6
8.3 REMEDIATION	6
9. VIOLATIONS OF THIS POLICY.....	7
10. POLICY REVIEW	7
<i>Human Rights Due Diligence Questionnaire</i>	8

1. INTRODUCTION

The Galápagos Life Fund (GLF) is dedicated to creating an inclusive society in which all people's inherent rights are respected, regardless of race, gender, language, religion, or personal characteristics. The GLF promotes and respects the protection of internationally recognized human rights, as articulated in the Universal Declaration of Human Rights¹ and core international human rights treaties.

In our interactions with employees, grantees, contractors and suppliers, and a wide range of stakeholders, including project partners, investors, and society as a whole, we strive to respect and promote human rights in accordance with the United Nations Guiding Principles on Business and Human Rights². We work hard to ensure that our business activities do not cause or contribute to adverse human rights effects, and we will address any such effects when they occur.

2. PURPOSE

This policy aims to clearly establish GLF's commitment to promoting and safeguarding human rights in all its endeavours, as well as the alignment of its various policies across the organization. We recognize that in order to accomplish this, we must operate our business ethically, accountably, and transparently, while upholding and promoting human rights. Our values are a testament to this dedication and are fundamental to every facet of our operations.

3. SCOPE

All GLF employees and project partners, including GLF's grantees, contractors, suppliers, consultants, and their employees, sub-grantees, and representatives, are required to comply with this policy.

4. DEFINITION

For this policy, the following definitions apply:

- **Human Rights:** Human rights are inherent to everyone simply because they are human; they encompass fundamental rights, freedoms, and standards of treatment that are globally recognized as belonging to every human being. The United Nations Declaration on Human Rights defines these fundamental rights. The International Covenant on Civil and Political Rights, the International Covenant on Economic, Social, and Cultural Rights, the eight core International Labour Organization Conventions, and other relevant covenants and treaties all uphold these principles.
- **International Labor Organization:** The International Labour Organization (ILO) is the international organization under the United Nations responsible for developing and supervising international labour standards. It is the only United Nations organization that brings together

¹ UN General Assembly. (1948). Universal declaration of human rights (217 [III] A). Paris.

² Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework (2011) New York; Geneva.

government, employer, and worker representatives to collaborate on policies and programs aimed at improving working conditions for all.

- **ILO Conventions:** The Freedom of Association and Protection of the Rights to Organize Convention, 1948; the Right to Organize and Collective Bargaining Convention, 1949; the Forced Labor Convention, 1930; the Abolition of Forced Labor Convention, 1957; the Minimum Age Convention, 1973; the Worst Forms of Child Labor Convention, 1999; the Equal Remuneration Convention, 1951; and the Discrimination (Employment and Occupation) Convention, 1958.
- **United Nations Global Compact:** The UN Global Compact is a strategic policy initiative for businesses that pledge to align their operations and strategies with 10 internationally accepted principles in human rights, labour, the environment, and anti-corruption. The Global Compact exists to assist the private sector in managing increasingly complex risks and opportunities in the environmental, social, and governance domains, with the goal to embed markets and societies with universal principles and values that benefit everyone.
- **United Nations Guiding Principles on Business and Human Rights (UNGPs):** The United Nations Human Rights Council unanimously endorsed the UN Guiding Principles on Business and Human Rights. The UNGPs are the world's most authoritative, normative framework guiding responsible business conduct and addressing human rights abuses in business operations and global supply chains.
- **Universal Declaration of Human Rights (UDHR):** The United Nations General Assembly proclaimed the Universal Declaration of Human Rights in 1948. It includes thirty human rights that are expected to be universally recognized and protected.

5. PRINCIPLES

The GLF's position on human rights is in accordance with global human rights standards, which are based on the principles outlined by the United Nations Global Compact. Our adherence to the United Nations Global Compact Principles involves supporting the Universal Declaration of Human Rights and the ILO's Declaration on Fundamental Principles and Rights at Work, which are internationally acknowledged standards. GLF is committed to respecting people's rights. The Human Rights Policy is guided by the following principles:

- **Principle 1:** support and respect the protection of internationally proclaimed human rights.
- **Principle 2:** make sure that they are not complicit in human rights abuses.
- **Principle 3:** uphold the freedom of association and the effective recognition of the right to collective bargaining.
- **Principle 4:** uphold the elimination of all forms of forced and compulsory labour.
- **Principle 5:** uphold the effective abolition of child labour.
- **Principle 6:** uphold the elimination of discrimination in respect of employment and occupation.

6. COMMITMENTS

Directed by the international standards and our own organizational policies, we commit to:

- Ensure that all parties that fall under the scope of this policy (Section 3) are aware of our expectations to protect the rights and dignity of everyone we interact with.
- Ensure that all employees receive the necessary human rights training.
- Enhancing organizational awareness of human rights issues and advocating for diversity and inclusion initiatives will ensure that GLF maintains its progress towards becoming a fully inclusive organization.
- Ensure that noncompliance with this policy and related legislative obligations are addressed appropriately by the relevant oversight bodies in accordance with legal and ethical guidelines.
- Ensure that employees and project partners understand and have access to information on where and how to report non-compliance with this policy.
- Promote an environment of honesty and responsibility that encourages everyone to speak out against human rights violations without fear of retaliation.
- Ensure that our business's operations, actions, and decisions consider the impact on human rights. This will be achieved by screening our project partners and suppliers using the Human Rights Due Diligence Questionnaire (see Appendix A).
- Promote diversity and inclusion among the people with whom we work. We are committed to equal opportunity and will not tolerate discrimination or harassment.
- We respect our employees' right to join, form, or not join collective bargaining associations without fear of reprisal, intimidation, or harassment.
- Ensuring the well-being and safety of our staff is our top priority. We are committed to creating a safe and healthy work environment while adhering to all relevant safety and health laws and regulations, as well as internal standards.
- We are committed to maintaining our workplace safe and free of violence, harassment, intimidation, and other unsafe or disruptive conditions caused by internal and external threats. Employee security safeguards are provided as needed and are maintained while respecting employee privacy and dignity.

7. HUMAN RIGHTS DUE DILIGENCE APPROACH

Our human rights due diligence procedure is divided into four stages. The first stage is identifying and evaluating existing and potential implications. The second stage focuses on integrating and implementing the findings. The third stage is focused on tracking and monitoring progress. Finally, we communicate with key stakeholders in the fourth stage.

1. **Identify and assess actual or potential risks:** We recognize and evaluate both actual and potential negative impacts on human rights that may arise from the actions of our projects and project partners. This assessment encompasses direct effects resulting from their operations as well as those that may occur through their supply chain.
2. **Integrate and act:** Following the identification of potential and actual adverse impacts, we prioritize the most severe impacts for action, beginning with actual adverse impacts. In

accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs), we incorporate and respond to the assessment findings by allocating the necessary resources to mitigate the identified impacts.

3. **Track and monitor:** As part of the grant making and ongoing grant management and monitoring process, the GLF will evaluate all grantees, subgrantees and other project partners. We understand that the risk profile of our grantees and project partners may change over time. Regular assessments will safeguard our brand and ensure compliance with the law.
4. **Communicate with stakeholders:** Throughout the due diligence process, we will actively engage with relevant stakeholders to ensure a comprehensive risk assessment and timely implementation of risk mitigation measures. Furthermore, we will incorporate an overview of our human right's due diligence framework into the application requirements for GLF grants and procurement procedures. This transparency will enable key stakeholders, particularly investors, to better understand our risk reduction activities and improve the organization's preparedness in the case of any potential negative media coverage.

8. IMPLEMENTATION, MONITORING AND REMEDIATION

8.1 IMPLEMENTATION

We seek to establish a workplace where open and honest communication among all employees is valued and respected, and we are committed to adhering to all applicable labour regulations. GLF will ensure employees, grantees and other project partners are aware of this policy by raising organizational awareness to ensure that GLF is a progressive organization.

8.2 MONITORING

We regularly monitor the effectiveness of our Human Rights Policy. This includes tracking the implementation of the Human Rights Policy and supporting initiatives, collecting feedback from stakeholders, and conducting periodic reviews of our human rights performance. We publicly report on our human right's due diligence efforts in accordance with relevant standards and frameworks. The Executive Director is responsible for both promoting and monitoring compliance with the Human Rights Policy.

8.3 REMEDIATION

If adverse human rights impacts occur, GLF will take immediate steps to:

1. **Investigate** the incident promptly and thoroughly to determine the root causes and extent of the harm.
2. **Provide appropriate compensation** to affected individuals or communities for any losses incurred.
3. **Develop and implement corrective action plans** to prevent recurrence of the issue.
4. **Offer rehabilitation and support services** to affected individuals, as needed.
5. **Cooperate with relevant stakeholders**, including government agencies, NGOs, and affected communities, to address the issue and prevent future harm.

6. **Report on the incident and remediation efforts** in accordance with internal and external reporting requirements.

9. VIOLATIONS OF THIS POLICY

Violations of the Human Rights Policy will be met with zero tolerance and may result in internal disciplinary measures, termination of employment, cancellation of contracts or grant agreements with project partners, or potential criminal prosecution. If an employee or project partner discovers a violation of the Human Rights Policy, has questions about the policy, or wishes to report a potential violation of the policy confidentially, they should contact their immediate supervisor or the Board of Directors.

GLF views any non-compliance with this policy and its obligations in terms of legislation in a serious light and encourages employees, grantees, other project partners and otherwise project affected people to report any act of human rights violation confidentially (and anonymously, if desired) through the following channels:

- GLF's Ethics Hotline
- Online Contact Form (found on the GLF website's contact page)
- Accountability and Grievance Mechanism

10. POLICY REVIEW

This policy will be reviewed annually and updated if necessary, and thereafter endorsed by the GLF Board of Directors.

APPENDIX A: HUMAN RIGHTS DUE DILIGENCE QUESTIONNAIRE FOR GLF GRANTEES AND OTHER PROJECT PARTNERS/SUPPLIERS

Human Rights Due Diligence Questionnaire	
Grantee/Project Partner/Supplier: _____	Month / Year: _____
Completed by: _____	Signature: _____

	Key Questions	Yes/No √ X	Comments/Action Plan
Identifying risks from products, services and business model			
1	Do you have a policy or statement that articulates your commitment to human rights in your operations and supply chain?		
2	Does your company’s business model, existing products, services, or solutions pose inherent risks to people?		
3	What human rights impacts may arise from new products and services, or acquisitions? Please elaborate.		
4	Are there any human rights risks inherent in your company’s markets or operational context?		

Taking action to prevent and mitigate risks			
5	What processes and procedures are in place to ensure human rights issues are identified and assessed in your supply chain?		
6	Are there any human rights risks inherent in your suppliers or customers’ markets or operational contexts?		
7	How does your supplier or customer operationalize their responsibility to respect human rights?		
8	How does the company support the identification of human rights risks?		
9	What due diligence checks are integrated before or at the point of sale?		

10	What governance structures are in place to help your company respond to identified risks?		
----	---	--	--

Taking action to prevent and mitigate supply chain related risks			
11	What expectations do you have of suppliers and business partners?		
12	Do you perform human rights audit verifications on your suppliers and business partners? If yes, how often?		
13	Has the company provided any human rights training for its employees in the past year? If not, does the company need any assistance in this regard?		
14	Does your company provide training and guidance to business partners and suppliers on identifying and assessing actual or potential risks to human rights?		
15	Does your company track and monitor all business partners and suppliers with respect to human rights risks? If yes, how often?		
16	Does your company communicate the management of business partners and suppliers' human rights risks?		