



VAN LANSCHOT
KEMPEN

Human Rights and Labour Rights policy

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1. Introduction

The idea of human rights is as simple as it is powerful: that people have a universal right to be treated with dignity. Every individual is entitled to enjoy human rights without discrimination – whatever their nationality, place of residence, sex, national or ethnic origin, colour, religion, language or any other status. Human rights are interrelated, interdependent and indivisible.¹

Around the world peoples' human rights are being violated. In 2017, according to the International Labour Office (ILO), 40 million people were victims of modern slavery – this includes approximately 25 million people in forced labour. Furthermore, one in four of these victims were children. As stated by the PRI, the financial industry must play a critical role in facilitating sustainable development and growth, and in ensuring that people's fundamental dignity and rights are upheld.

As a responsible wealth manager we are committed to respect international human rights², at all times and in all the different roles we fulfil: as a lender, investor, service provider, employer and purchaser. Therefore the scope of this policy covers these five roles.

We realise that we can cause, contribute to or be directly linked to potential adverse human rights impacts via our business operations and relations.

2. Background and approach

To underline our position on international human rights, we are a signatory to the [UN Global Compact \(UNGC\)](#), a global standard for companies to align their strategies and operations with universal principles on human rights, labour, environment and anti-corruption. We support the [UN Guiding Principles on Business and Human Rights \(UNGPR\)](#), the [OECD Guidelines for Multinational Enterprises \(MNEs\)](#), the [Principles for Responsible Investment \(PRI\)](#) as well as a range of other ILO and UN Conventions, listed in our [Convention library](#). We are also a member of the Investor Alliance for Human Rights. While many of these principles and conventions primarily target large listed companies, we explicitly apply these to our private markets investments as well. To understand how the OECD Guidelines for MNEs apply to Van Lanschot Kempen, please read our document outlining our compliance by clicking [here](#).

We have a responsibility to respect human rights by avoiding causing or contributing to adverse human rights impact through our own activities and to address such impacts if they occur. The overarching ambition of our human rights and labour policy is to avoid harm, eradicate malpractice, remediate negative impacts and to generate positive social outcomes and impact along the value chain. We believe that companies can only be successful over the long term if they generate sustainable social, environmental and financial value for all stakeholders.

This policy combines labour and human rights because many of the labour rights (such as right to work, right to living standard) can be considered as part of the fundamental human rights.

We have extensive due diligence procedures and policies in place to identify, prevent, mitigate and remedy potential or actual negative human rights impacts. Our due diligence procedures

¹ PRI

² We define international human rights as the rights laid down in the eight core ILO conventions and the International Bill of Human Rights. The latter consists of the Universal Declaration of Human Rights and the two covenants by which this declaration was codified in international law: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights

are ongoing and make use of specific filters, standards and parameters for sectors that are deemed potentially high-risk from a human rights perspective. We have also established specific policies to exclude companies that structurally harm human rights, e.g. manufacturers of controversial weapons. In the period ahead we aim, in addition to the disclosures in our integrated report, to further improve our reporting on human rights (policies, implementation and results) by using – among others - the UN Guiding Principles Reporting Framework.

3. International Human Rights

International standards, norms and covenants aim to safeguard all basic human rights. The Office of the United Nations High Commissioner for Human Rights defines human rights as *“the rights inherent to all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, color, religion, language, or other status”*. All human beings are equally entitled to human rights without discrimination. These human rights are described in the International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights and its two Optional Protocols. In addition to the International Bill of Human Rights, there are also standards developed by the International Labour Organisation (ILO), which are part of the international framework of human rights. This includes the eight core ILO conventions. Additional human rights treaties define in greater detail various rights with respect to particular groups of people or circumstances. See Appendix 1 for further information as well as our convention library for the list of treaties and covenants we seek to adhere to.

Respect for human rights is fundamental to advancing the United Nations Sustainable Development Goals (SDGs), as stated by PRI. Through our three focus themes: Climate and biodiversity, Smart and circular economy and Living better for longer³ we seek to address multiple goals. One of the goals we seek to address and align with is UN Sustainable Development Goal 8 which links strongly to human rights as it seeks to “promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.” This includes seeking to eradicate forced labour, human trafficking and other human rights and labour rights violations.

4. Businesses’ role

The role of governments is to protect human rights. There is increasing recognition that the role of businesses is to respect human rights. Businesses can serve as a force for good and help with promotion of human rights, creating employment and wellbeing. At the same time businesses can also have negative impact on human rights of others in the worst cases death, injuries at work and resettlement of communities. Companies that violate human rights are being held accountable and need to remediate affected individuals and communities. From a company perspective, there are further financial and reputational risks involved such as delay of projects or penalties.

In all of our roles, we seek to respect international human rights and labour rights. This includes, but is not limited to, forbidding child labour, forced labour, human trafficking, discrimination as well as respecting freedom of association, equal remuneration, the right to collective bargaining

³ Sustainability (vanlanschotkempen.com)

and other rights. We also expect the parties with which we interact, whether it be in our role as an investor, lender purchaser, service provider or employer to do the same.

As **investor, lender or purchaser** we do not expect to cause or contribute to any negative impacts in relation to the various OECD themes. However, via the activities and supply chains of our borrowers, suppliers or investees we could become *directly linked to* some negative impacts, especially when these supply chains are located in regions with relatively weak regulation and enforcement, e.g. in emerging economies (i.e. non-high-income OECD countries). These impacts will most likely relate to the OECD themes employment, human rights, environment, bribery, and - to a lesser extent - consumer interests.

As a **service provider** we expect to run a certain risk of *causing or contributing* to negative impacts. In the field of human rights and consumer interests, e.g. if we were to cause client data leakages ourselves, if we were to misuse client data or if we were to provide products and solutions that do not add value to our clients. In the event that our business partners create such impacts, we would be *directly linked to* these impacts.

As an **employer** we see a certain risk of *causing or contributing* to negative impacts in the field of employment and human rights, e.g. in the event of discrimination, sexual harassment or unhealthy working conditions. If one of our business partners (e.g. a temporary employment agency) were to do this, we would become *directly linked to* the impact.

We have specific **policies** in place to identify, prevent and mitigate real and potential negative impacts. These policies, which are further explained in the sections below, follow various international frameworks, e.g. the Principles for Responsible Investments (PRI), UN Global Compact (UN GC), ILO Conventions, the UN Guiding Principles on Business and Human Rights (UN GP) and also the OECD GL. In line with OECD recommendations (OECD, 2018, page 42) our policies focus on the most 'significant' adverse impacts. Significance here is understood as a function of likelihood and severity. Severity of impacts will be judged by their **scale, scope and irremediable character**. Scale refers to the gravity of the adverse impact, scope concerns the reach of the impact (e.g. the number of individuals that are or will be affected) and irremediable character means any limits on the ability to restore the individuals or environment affected to a situation equivalent to their situation before the adverse impact.

5. Implementation: investment approach

We are exposed both directly or through investment funds to a large number of entities. As a wealth and asset manager, we are primarily exposed to **potential and actual** human rights and labour rights impacts through our investments globally.

Van Lanschot Kempen acknowledges the complexity of the environment in which we operate and is conscious about the possibility that some of our investments in higher risk sectors may cause or contribute to adverse human rights impacts. Our ability to manage these risks or to have influence on mitigating them in our investments largely depends on the investment strategy and the possibility of using our leverage through the different responsible investment tools in the investment process.

We use the following approaches with listed companies to manage our Environmental, Social and Governance (ESG) risks and opportunities and integrate them in the investment process: (1) avoidance and exclusion, (2) ESG integration, (3) active ownership (engagement and voting) and (4) positive impact. In addition, we have processes in place for unlisted companies. These

approaches are used to minimize the negative and, where possible, to contribute to a positive impact on human rights on behalf of our clients. Our exclusion and avoidance criteria seeks to address actual human and labour rights impacts. Through monitoring and engagement we seek to address potential human and labour rights impacts.

We seek to respect international human rights and labour rights and expect our investee companies to do the same. In line with the [European Sustainability Reporting Standards](#), this includes, but is not limited to, our investee companies' own workforce, their value chain, their affected communities and their end-users and consumers.

5.1 Exclusion and Avoidance

As previously stated we have established specific [policies](#) to exclude companies that structurally harm or violate human rights, e.g. manufacturers of controversial weapons such as cluster munitions or nuclear weapons.

For our **listed investments**, we make use of our data vendors to investigate companies' actual human rights and labour rights violations and controversies. We have avoidance lists that are updated quarterly. Human rights and labour rights violations - amongst other reasons - are potential reasons why companies may be placed onto this list. The controversies that are screened for include, but are not limited to, human rights controversies, human rights local communities controversies, labour rights controversies such as child labour controversies, collective bargaining and union controversies as well as customer controversies. Controversies screened for seek to cover our investee companies own workforce, their value chain, the impacted local communities as well as their end-users and consumers.

In line with the Principal Adverse Impact (PAI) indicators of the EU Sustainable Finance Disclosure Regulation (SFDR) we also monitor our investee companies (and potential investee companies) for violations of the UN Global Compact Principles and OECD Guidelines for Multinational Enterprises. We seek to avoid companies that have a UNGC fail status on a comply or explain basis. As part of the principal adverse impacts of our investments on social and particularly human rights matters, we want to establish whether there are sufficient processes and compliance mechanisms in place with our investee companies to monitor compliance with the UN Global Compact principles and OECD guidelines. Our commitment to the OECD guidelines seeks to ensure that we take account of the impact of our activities on people and the environment. More information about how we comply with the OECD Guidelines can be found [here](#).

Our exclusion and avoidance actions apply to all fund managers where we have influence⁴. In order to assess the severity and relevance of various human rights issues with respect to a specific investment, we have included overall environmental, social and governance assessments as part of the screening, due diligence, selection, approval and monitoring process of our **external managers**. We ask our external managers to report on how ESG considerations and Responsible Business Conduct are integrated in their investment process.

⁴ By 'influence' we refer to a broader term than active funds, we refer to: (1) we generally have influence where allocation amounts are high (for active and passive fund managers); (2) we have influence for mandates via BestSelect; (3) we have influence where the selected fund is a co-creation between Van Lanschot Kempen and the asset manager in question.

For **private companies** we assess companies on the above mentioned criteria and engage with them proactively where we identify concerns. The Van Lanschot Kempen Investment Committee (IC) of each fund oversees that avoidance and exclusion criteria are implemented. Portfolio Managers are in touch with the external managers who are directly responsible for implementing the policy, due diligence, report salient issues and ensure access to remedy.

Our human rights and labour rights policy commitments are relevant to affected communities which includes indigenous peoples. This includes policies to monitor compliance with the UN Global Compact principles and OECD Guidelines for Multinational Enterprises as well as engaging with affected stakeholders - putting in place measures to enable remedy for human rights impacts whether we contribute to or are directly linked to them. This includes issues involving land rights disputes. Measures taken include the previously mentioned screening processes such as, including but not limited to, screening for human rights impacts on the local community of the investee company. For our non-listed companies this process is included in our due diligence.

In cases where credible third-party research indicates that our investee companies may be financing activities that are linked to forced labour, modern slavery, discrimination or abuse based on ethnicity, gender, religion or sexual orientation or are financing illegal settlements or occupation of land contradicting international agreements, and where we believe we can have an impact/influence, we engage with these companies to clarify their activities and respond to allegations. We escalate these engagements or join collaborative engagements with other investors where meaningful. In cases where the response from the company is insufficient or we can confirm the proof of the allegations, the company will be assessed to be potentially added to our conduct-based avoidance list.

Sovereign entities have an obligation to protect and respect human rights. This is taken into consideration in our Government Bond Policy which indicates which **government bonds** can be purchased by funds over which we have influence. Countries that have EU/UN Sanctions and/or severe violations – such as those that structurally harm human rights - may be placed on our government bond exclusion list as well, in alignment with PAI 16.

5.2 ESG Integration

Selection, due diligence and monitoring

We seek to factor in human rights and labour rights in our investment analysis where these factors are most material. This policy commitment to respect human rights and labour rights is integrated into our governance frameworks, management systems, investment beliefs, policies and strategy.

We monitor our investee companies for compliance with the UNGC principles and OECD guidelines and seek to address and consistently monitor any violations to these standards. The UNGPs indicate that human rights due diligence has to go beyond identifying the material risks to the company or to investors, and should focus on those human rights that are at risk of the most severe negative impact on community or environment through the company's activities. The UN Guiding Principles on Business & Human Rights (UNGP) compliance screen of our

portfolios looks at severity of labour and human rights violations of the investees not only from materiality perspective but also from salience perspective.

The screen encompasses a full array of human rights issues as well as the labour rights issues outlined by the ILO and company involvement in controversies that may represent a violation of the UNGP. The first factor in the screen is human rights such as general human rights concerns, indigenous peoples rights, civil liberties, disputed territories issues and environmental incidents that harm local livelihoods. Other factors considered include, but are not limited to, forced labour, child labour, discrimination and collective bargaining and freedom of association in direct operations as well as the supply chain. Adding to this, we also break the Environmental, Social and Governance factors into multiple risk factors. The social factors also include data privacy and security, occupational health and safety as well as specific focus on access to basic services and community relations. Human and labour rights related factors have different weighting in our investment research depending on the asset class and industry. For example, for companies active in extractive sectors, impacts on local communities may be more material than in other industries. In the Real Assets asset class several social factors are seen as material and are factored in the investment case.

The UN Office of the High Commissioner on Human Rights stated in 2017 that ‘for businesses, the most powerful contribution to sustainable development is to embed respect for human rights in their activities and across their value chains, addressing harm done to people and focusing on the **potential and actual impacts**’. Therefore, as part of our human rights and labour rights due diligence processes it is important for us to investigate, mitigate and account for issues that are potential material risks going forward.

5.3 Active Ownership

Engagement and Voting

Where we have influence, we will engage with the companies and other stakeholders to call on them to respect human and labour rights.

We expect companies to understand their risks and responsibilities regarding human rights such as basic labour rights in their business operations. By basic labour rights, we mean in accordance to the ILO conventions⁵, where employees have the right to good working and labour conditions and respect of their labour rights. Companies should demonstrate this in their strategy, policies, risk management, targets and metrics and reporting, for their own operations and supply chains. Once actual or potential adverse impacts have been identified we seek engagement with these companies asking for improvements on ESG topics including human rights and labour rights. This is one of the approaches that we use to fulfil our responsibility as an active shareholder on behalf of our stakeholders. We believe that companies that respect human rights and labour rights – along with managing their other material sustainability issues well - will be ultimately more resilient in the long term.

For our engagements with private companies we assess and engage with them proactively where we identify concerns.

⁵ ILO, “Conventions and Recommendations”, <http://ilo.org/global/standards/introduction-to-international-labour-standards/conventionsand-recommendations/lang--en/index.htm>

If we choose the engagement route it is possible to take two potential approaches or a combination of the two presented below.

1) Actual Impact Engagements

Engage with companies that have human rights and labour rights controversies such as those companies that violate the UNGC Principles/ UNGPs. Ensure that these companies have put sufficient processes in place to address and remediate the adverse negative impact on communities or individuals involved. If companies are unwilling to improve their practice, ultimately we can choose to escalate or divest from them.

2) Potential Impact Engagements

Review holdings and identify companies operating in sectors and geographies that make them more vulnerable to potential labour and human rights abuses. Engage with these companies proactively to ensure they have the right tools and systems in place to prevent those risks from materializing and have adequate procedures in place to prevent or remediate possible negative consequences.

We have been active in direct and collaborative engagements regarding living wages with apparel and textile companies. We aim to ensure that employees are paid a livable wage. For more information about this engagement, click [here](#). We are also supporting the PRI Social Issues engagement which is a collaborative stewardship initiative for human rights and social issues, Advance.

Next to engagements we can use our **voting** rights to express our views on labour and human rights performance of the investees and companies sustainability performance. We use our voting rights in line with our engagement activities. For example, we may also exercise our voting rights regarding unadjusted gender pay gaps or issues relating to board gender diversity. More information can be found in our [Proxy Voting Policy](#). We review shareholder proposals addressing human and labour rights on a case by case basis and are likely to support meaningful requests towards management on safeguarding these rights and increasing public disclosure on related topics.

Workplace practices and other social matters

We support proposals that ask companies to report on the quality of their workplace practices and on their efforts to improve the quality of their workplaces.

Discrimination in employment

We are likely to support shareholder proposals that require companies to prohibit discrimination in employment, including proposals to expand or clarify anti-discrimination policies. We expect companies to report on diversity in their workforce, except when those reports already exist and are readily available to shareholders.

We vote against proposals that would exclude any group of people from policies against employment discrimination.

Operations in zones of conflict

We support shareholder proposals that require companies operating in conflict zones to establish policies to protect the rights of local communities and to avoid exacerbating conflicts.

5.4 Positive Impact

In addition to avoiding doing harm Van Lanschot Kempen also looks to invest in solutions that create a positive impact. For example, through our thematic / impact investing portfolio we are investing in companies that pay living wages and provide safe and decent working conditions. We are aware that expected positive impact cannot offset potential negative impacts on labour and human rights and we are including these issues into our due diligence and monitoring process.

Our aim to align with and contribute to UN SDG 8 through our investments also seeks to create positive impact. Further alignment with and contribution to UN SDG 3 Good Health and Well-Being may also contribute to positive impacts on human lives. Alignment and contribution to SDG 3 is addressed through our focus theme Living Better for Longer.

A notable internally generated solution is the [Global Impact Pool](#). The Global Impact Pool (GIP) is a multi-asset class investment vehicle which aims to address global challenges whilst also meeting clients' risk-return requirements.

6. Implementation: balance sheet

6.1 Role as a lender

Aside from our role as an investor we are also a **lender**. We seek to respect human rights and labour rights in *all* of our roles and expect those with whom we interact to do the same. This applies to all affected parties, such as workers in the value chain, the affected communities as well as the end-users and consumers.

Van Lanschot Kempen's corporate **lending** book is highly concentrated. It consists mainly of loans to business professionals in specific sectors (e.g. health care professionals, lawyers, accountants, etc.) and Dutch SMEs which on average have low involvement in labour or human rights issues, environmental issues or corruption cases. The number of borrowers active in manufacturing and/or with production facilities abroad is also small. Most borrowers have their businesses in the Netherlands and are therefore governed by Dutch laws and regulations. These laws are relatively stringent and well enforced.

In order to be able to identify, prevent, mitigate and remedy potential and actual negative labour, human rights, environmental, corruption or consumer impacts in relation to our corporate lending activities, we have established an ongoing due diligence process. This process focuses on borrowers (including their suppliers) with a (potential) high risk profile in these sustainability fields. In practice, this means that we focus our additional due diligence particularly on borrowers in potentially high-risk sectors such as agriculture, garments, toys, furniture, other manufacturing, oil and gas sector and mining. For more information about our responsible corporate lending, please see our [Responsible lending policy](#).

7. Implementation: clients

7.1 Role as a service provider

Our human rights and labour rights policy applies to all stakeholders, including our **clients** who are our end-users and consumers of our products and services. In general, prospects and clients expect to be treated well by business partners and other organisations, regardless of the topic. To manage such client-related topics, we have implemented various policies.

Discretion is of vital importance to our company and is one of our five core values. The proper management of personal data integrity (data privacy) is essential to keep our discretion towards our clients. Our client's [Privacy Statement](#) addresses this. To assure compliance with the applicable laws and regulations, we have created an extensive framework for managing personal data and appointed a Data Protection Officer (DPO). Van Lanschot Kempen is subject to the General Data Protection Regulation (GDPR), and endorses the Code of Conduct for processing personal data by financial institutions, which goes a step further than the GDPR and takes into account the specific features of the financial sector.

We have also established a product approval policy for our clients. To assure added value for our clients, we apply an approval process for new products and services, as well as periodic review of existing products and services. This is carried out under the PARP and Product Governance Policy.

For more detailed information about these policies see [How we comply with the OECD Guidelines for MNEs](#).

8. Implementation: own operations

8.1 Role as a purchaser

Van Lanschot Kempen also fulfils the role as a **purchaser** regarding procurement for our own organization. Our procurement processes are also covered by this policy as we seek to uphold labour standards in the supply chain by respecting human rights and labour rights at all times. We expect our business partners in the supply chain to also seek to uphold human rights and labour rights in their business practices. Therefore, human rights and labour rights considerations are integrated into our selection process for our suppliers. In 2015 we incorporated our responsible purchasing policy within a broader framework, the business partner due diligence (BPDD) policy, which applies to all our divisions. The BPDD policy ensures that we only work with business partners which meet our integrity and sustainability standards. It is used to analyse and manage risks prior to and during collaboration. During the second quarter of 2022, this policy is undergoing further developments.

8.2 Role as an employer

In addition to our investments and other activities, we are also a company with over 1600 employees. Therefore, it is very important for us to look internally at our human rights impact for our own workforce in our role as an **employer**.

We commit to respect human rights and labour rights for all stakeholders, which includes our own workforce. Therefore our human rights and labour rights commitment applies to all Van Lanschot Kempen employees where our company has management control.

Our Code of Conduct, to which every employee must adhere, goes further than complying with relevant legislation. It includes guidelines on how employees should act with integrity and balance the interests of all stakeholders. Our Code also includes the Banker's Oath, which all our employees are required to sign. For more information about governance within our company, click [here](#).

We align with the Platform for Living Wage Financials and commit to paying our employees a wage that is in excess of both minimum wage and a is effectively a living wage. In line with our core values, we support the principles of both equal opportunity and equal pay in comparable positions. As a fundamental value, we do not tolerate any form of discrimination among the workforce. This is in line with the UN Global Compact Principle VI regarding discrimination and equal remuneration. In the second quarter of 2022, we published our new Inclusion and Diversity Policy.

Pillar 3 of our Inclusion and Diversity Policy addresses flexible and inclusive labour and working conditions. We are committed to give space to our employees to express their personal identities and to meet their individual needs we are committed to offering flexible and inclusive labour and working conditions, thereby stimulating a greater sense of belonging for all of our colleagues.

Pillar 4 of our Inclusion and Diversity Policy is built on our commitment to equal pay for equal work – we strive for a level playing field.

Pillar 5 of our policy focuses on structurally improving how inclusive we are as a company. We seek to continually foster an open dialogue and create awareness of the importance of an inclusive environment where our employees, our clients and all stakeholders feel welcome. We structurally embed safe spaces in order that our colleagues feel safe to speak out in case they experience inappropriate behaviour. We have systems in place, both internally and externally, to prevent, report and address complaints – and seek to we actively take steps to both engage our colleagues in dialogue and to remove any barriers to speaking up. More information about this policy and inclusion and diversity at Van Lanschot Kempen can be found [here](#).

Our well-being policy for all employees is reviewed and updated periodically. In addition, we provide learning and development options for employees who wish to further develop specific skills.

It is also very important to us that we seek to respect our employees right to privacy. We have policies in place that safeguard our employees personal data. These policies apply to all employees both internal and external within Van Lanschot Kempen thereby seeking to safeguard all individuals working under the responsibility of Van Lanschot Kempen. Discretion is of vital importance to our company and is one of our five core values. The proper management of personal data integrity (data privacy) is essential to keep our discretion towards our employees. We are bound by the General Data Protection Regulation (GDPR), local legislation on the implementation of the GDPR and local legislation on the implementation of the ePrivacy Directive (Telecommunicatiewet).

Our own operations may also have an impact on the local community in which we exist. This includes, but is not limited to, the families and communities we impact through our employees and office locations.

9. Whistleblowing and complaints procedures for all parties

Van Lanschot Kempen is of the opinion that all its stakeholders (clients, shareholders, employees, society at large) should be able to report irregularities, we have installed various complaints procedures.

Whistle-blower procedure for employees:

To ensure that employees can always report (presumed) general, operational or financial irregularities, even if they experience (internal) barriers to doing so, Van Lanschot Kempen has a whistle-blower procedure in place. The procedure can be found under 'Reporting irregularities' at www.vanlanschotkempen.com/en/governance. The whistle-blower procedure is not intended for issues concerning labour, labour conditions, sexual harassment, violence, bullying, aggression, violence and discrimination. For those topics, employees can contact our Human Resources department or the confidential counsellors available to all employees.

Complaints procedure for third parties:

If third parties, e.g. suppliers, intermediaries or NGOs, wish to lodge a complaint they can contact our Compliance Director via our [corporate website](#) (see under 'Reporting irregularities'). If clients wish to lodge a complaint concerning general, operational or financial irregularities, they can use the complaints procedure (also published on our [corporate website](#)).

10. Governance

The Sustainability Board sets the Human Rights and Labour Rights policy which is also discussed in the Sustainability Investment Council and the Loans & Own Organisation Council and the policy will be reviewed periodically to reflect material changes. This policy is approved at the most senior level and is informed by relevant expertise.

11. Reporting on progress

We aim to report to our clients, and other stakeholders, on how we progress with regards to the commitment, ambition and objectives of our (client) portfolios. The reporting frequency will be at least annually.

12. Implementation

A significant amount of this policy has already been implemented. We aim to implement the full policy by the end of 2022.

13. Appendices

Appendix 1: International treaties and conventions

Labour Rights

1. ILO – Abolition of Forced Labour Convention, 1957/130
2. ILO – Worst Forms of Child Labour Convention, 1999
3. ILO – Hours of Work Convention, 1919/130
4. ILO – Occupational Safety and Health Convention, 1981
5. ILO – Termination of Employment Convention, 1982
6. ILO – Discrimination (Employment and Occupation), 1958
7. ILO – Equal Remuneration Convention, 1951
8. ILO – Prevention of Major Industrial Accidents Conventions, 1993
9. ILO – Minimum Age Convention, 1973
10. ILO – Minimum Wage Fixing Convention, 1970
11. ILO – Right to Organize and Collective Bargaining Convention, 1949
12. ILO – Safety and Health in Mines Convention, 1995
13. ILO – Freedom of Association and Protection of the Right to Organise Conventions, 1948
14. ILO – Promotional Framework for Occupational Health and safety Convention, 2006
15. ILO – Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, 2006

Human rights

16. The Hague Convention, 1907
17. Geneva Convention on the Treatment of Prisoners of War, 1949
18. Geneva Convention on the Protection of Civilian Persons in Time of War, 1949
19. First Additional Protocol to the Geneva Convention on the Protection of Victims of International Armed Conflicts, 1977
20. ILO – Indigenous and Tribal Peoples Convention, 1989
21. International Convention on Civil and Political Rights, 1966
22. International Convention on Economic, Social and Cultural Rights, 1966

23. The Universal Declaration of Human Rights, 1948
24. Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, 1990
25. International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, 1990
26. Convention on the Elimination of all Forms of Racial Discrimination, 1965
27. Convention on the Elimination of all Forms of Discrimination against Women, 1979
28. Convention on the Rights of the Child, 1989
29. UN Convention on the Status of Refugees, 1951
30. Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, 1984
31. Code of Conduct for Law Enforcement Officials, 1979
32. General Assembly Resolution (XVII) of 14 December 1962, "Permanent Sovereignty over Natural Resources"
33. UN Declaration on the Rights of Indigenous Peoples, 2007
34. UN Guiding Principles on Business and Human Rights, 2011