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|  <p>PATHOLOGISTS<br/><b>LANCET</b><br/>KENYA (PLK)<br/>Key to diagnostic excellence<br/><i>Maabara ya Kisasa</i></p> | <b>PATHOLOGISTS LANCET KENYA HUMAN RIGHTS MANUAL</b>            |  |
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## Purpose

- To provide a basis for embedding the responsibility to respect human rights through all Business functions.
- To elaborate on the company's commitment to support human rights.
- To foster the development of in-house learning, management capacity and leadership on Human rights issues.

## Scope

This manual contains policies and procedures related to human rights policy issues as covered by the index.

## Responsibility

Management will take responsibility for implementation of this policy.

## Procedure

Refer to the guidance and reporting page of this manual on the procedure in this manual.

## References

H.R Department (*HRDSOP018 Revision 007, HRDSOP013 Revision 006, anti bribery policy and UNGC principle 1 and 2*)

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| <b>Abbreviations</b> | <b>Meaning</b>                                |
|----------------------|---|
| PLK                  | Pathologists Lancet Kenya                     |
| HR                   | Human Resource                                |
| UNGC                 | United Nations Global Compact                 |
| OSHA                 | Occupational Safety and Health Administration |
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## **PLK HUMAN RIGHTS POLICY**

### **1.0 Introduction**

Human rights refer to basic standard of treatment to which all people are entitled. It is abroad concept, with economic, social, cultural, political and civil dimensions. For pathologists Lancet Kenya, this means ensuring that our services are provided under conditions that demonstrate respect for the people who provide them and the people we offer the services to. It also means respecting the rights of people living in the communities around our facilities, and those of our suppliers who may be affected by our operations. Our values define who we are, with a code of conduct that guides us in achieving the standards set for our business through respect and support for human rights.

The state has a responsibility to protect against human right abuse by third parties, including businesses. Businesses have a corporate responsibility to respect human rights. Stakeholders also have a responsibility to put pressure on entities to respect human rights. Businesses are hence exposed to legal, commercial and reputational risks due to non-compliance to human right policies.

### **2.0 Purpose of the Policy**

#### **2.1 Respect for human rights**

This responsibility to respect human rights is incorporated in Principle One of the United Nations Global Compact (UNGC). Having committed ourselves to support the UNGC guiding principles since 2011, the respect for human rights is a key value of Pathologists lancet Kenya. As a company, we have a huge responsibility to respect International Human Rights Standards, which means not to infringe on people's rights and to address adverse human rights impacts that they cause or contribute to. We strive to respect and promote human rights in accordance with the UNGC Guiding Principles on Business and Human Rights in our relationships with our employees and our suppliers. We also ensure adherence to the state laws relating to Human rights.

This policy applies to all our employees and is meant to;

- i. To provide a basis for embedding the responsibility to respect human rights through all our functions.
- ii. To respond to stakeholder expectations and as a reference to where we stand on human rights.
- iii. To identify policy gaps and alert the company to new areas of risk during the human rights audits.
- iv. To build trust with our stakeholders and address their concerns on human rights.
- v. To trigger in-house human rights learning, management capacity and leadership
- vi. To demonstrate good business practice

We use human rights risk assessments to identify and prevent human rights risks internally and also our external interactions. We are committed to identifying adverse human rights impacts resulting from or caused by our business activities and we are we are committed to providing for or cooperate in, their fair and equitable remediation. We seek to promote access to remediation where we are linked to or involved in those adverse impacts through our relationships with third parties.

The Human Rights Policy is overseen by the Compliance committee, the Human Resources Department and the senior management.

The company has identified the key areas below with respect to human rights;

- i. Safety, Health and work place security**
- ii. Forced and child labor**
- iii. Engagement with third parties**
- iv. Working hours and wages**
- v. Sexual harassment**
- vi. Equality**
- vii. Maternity and paternity protection**
- viii. Non-discrimination**
- ix. Guidance and reporting**

### **3.0 Safety, Health and work place security (As per the HRDSOP018 Revision 007 Company Employees' Handbook)**

The company is committed to ensuring that employees have a safe working environment. We adhere to Occupational Safety and Health Administration (OSHA) compliance by engaging external firms to carry out fire, safety and operations audits.

It is the responsibility of all employees to ensure that they adhere to the safety rules and regulations applicable to their working environment at all times. A health & safety committee exists to promote all aspects of safety within the Practice.

All injuries sustained on duty must be reported to your immediate Supervisor and Occupational Health Sister immediately, irrespective of the severity thereof. The immediate Supervisor must ensure that a report from Work Claim form (obtainable from the Occupational Health Sister) is completed within 24 hours. (Refer to *HRDSOP018 Revision 007 pg 11 item 32*)

In every instance the Occupational Health Sister is responsible for the processing and completion of all other Injury on Duty report and correspondence. (Refer to *HRDSOP018 Revision 007 pg 11 item 32*)

### **4.0 Forced and Child labor**

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking. We also prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

### **5.0 Working Hours, annual salary increments and overtime (as per HRDSOP018 Revision 007 the Company Employee Handbook)**

Since Lancet has three different functional divisions i.e. Pathologists, Technical and Administration and many different staff positions within these functions it is not possible to specify the hours of work. However, hours of work are specified in all contracts of employment and we also communicate and agree with employees, either on joining or as currently required by Heads of Departments. (Refer to *HRDSOP018 Revision 007 pg 4 item 2*)

Annual salary increments are based on the yearly salary negotiation settlements in line with the prevailing policies of the Practice. (Refer to *HRDSOP018 Revision 007 pg 4 item 1*)

PLK compensates employees competitively relative to the industry and local labor market. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws. The work hours are clearly stated on employee contracts.

**6.0 Sexual Harassment (as per HRDSOP018 Revision 007 the Company Employees' Handbook)**

The company has a sexual harassment policy in place that ensures that the workplace is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats related to sexual harassment.

The sexual harassment of employees is considered to be a serious offence which should be reported immediately so that management may take appropriate disciplinary action. (Refer to *HRDSOP018 Revision 007 pg 12 item 41*)

The policy is circulated to all employees and gives clear guidelines on how to report such cases.

**7.0 Equality (as per HRDSOP013 Revision 006 the Company Recruitment Policy and Procedure Manual)**

PLK is a fair and an equal opportunity provider through- (Refer to *HRDSOP013 Revision 006 pg 1*);

- ❖ Ensuring support of the practice's vision of being a performance-driven company, in order to meet sound business ethics.
- ❖ By appointing quality applicants with accredited, recognized qualifications and competencies. By satisfying current and future staffing needs of the practice.
- ❖ By ensuring that all vacancies, through HR involvement, are filled with the right candidates within the right time frame, through the standard processes.

An elected Employment Equity Committee represents the interest of employees regarding the application of the Employment Equity Act. (Refer to *HRDSOP018 Revision 007 pg 11 item 40*)

**8.0 Engagement with third parties, referring to suppliers, clients, partners and suppliers (refer to the anti bribery policy and the UNGC principles 1 and 2)**

Pathologists Lancet Kenya is a member of the UN Global Compact (UNGC) Kenya chapter, whose mission is to spearhead and catalyze actions aimed at promoting good business practices by building capacity and awareness of ethics, integrity and Corporate Social Responsibility and to engage with the UNGC's Ten Principles with respect to human rights, labor, environment and anti-corruption. (Refer to the *anti bribery policy pg 1 item 1*)

Pathologists Lancet Kenya was among the first signatories to the UNGC Codes of Ethics that was launched in 2012 by the Business community in Kenya to provide a local guiding framework for ethical business practice. As a signatory to the UNGC Codes of Ethics, we have adopted the Code voluntarily committing ourselves to conduct ethical business with all our stakeholders including shareholders, employees, government, consumers, environment, society, suppliers, contractors and agents. *(Refer to the anti bribery policy pg 1 item 1)*

Pursuant to this commitment with specific reference to the UNGC Principles 1 and 2 on human rights, Businesses should support and respect the protection of internationally proclaimed human rights and make sure that they are not complicit in human rights abuses. *(Refer to the UNGC principles 1 and 2)*

While interacting with third parties, PLK ensures that;

- ❖ Third parties understand the nature and extent of our compliance.
- ❖ We monitor their activities effectively.
- ❖ We highlight our declaration of compliance.
- ❖ Offer Compliance training to those who require the training.

### **9.0 Maternity protection, paternity leave and annual leave (as per HRDSOP018 Revision 007 the Company Employees' Handbook)**

All employees are entitled to 21 working days leave per annum.

Leave is taken by arrangement with the Partnership. Leave entitlement depends on the employee's contract of employment and must be taken not later than 6 (six) months after the end of a 12-month employment period, and at a time that is mutually agreed between you and the Practice.

Female employees are entitled to three (3) consecutive month's maternity leave with full pay. Male employees will be entitled to two (2) weeks paternity leave with full pay.

Employees are entitled to 12 (twelve) days paid sick leave per annum or 36 (thirty-six) days in a 3 (three)-year cycle and a valid Doctor's note produced by the employee upon return.

Family responsibility leave (a maximum of 5 paid working days per year) will be granted in the following instances: - *(Refer to HRDSOP018 Revision 007 pg 5 item 4.5)*

- ❖ when the employee's child is born;
- ❖ when the employee's child is sick and when the spouse is hospitalized; or
- ❖ On the death of an immediate family member.

## **10.0 Non-discrimination**

PLK respects individual's human rights and will not discriminate on the basis of race, color, religion, creed, sex, age, social status, family origin, physical or mental disability or sexual orientation, nor will we commit other violations of human rights. Such discrimination will not be tolerated.

We ensure that we uphold human rights in everything we do and will not tolerate such discrimination in others. Ignorance and inaction will not constitute excuses for discrimination. We take pride in celebrating our diversity.

## **11.0 Guidance and reporting**

PLK strives to create workplaces in which open and honest communications among all employees are valued and respected. If an employee feels that their human rights are being violated, they can confidentially report this to the management, Chief compliance Officer, the human resource department or the [whistleblowing@lancet.co.ke](mailto:whistleblowing@lancet.co.ke) platform.