



**Berry Bros. General Contractors, Inc.  
Corporate Policy Procedure**

Section # 82

Issue Date: 11-28-17

**(HSE) Health, Safety & Environmental  
Policies and Procedures Manual**

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Revision: 0

Approver: Joe Berry

Title: **CORPORATE SOCIAL RESPONSIBILITY**

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**SUBPART A - COMMITMENT**

Berry Bros. General Contractors, Inc. (BBGCI) shares a commitment to human rights as outlined in this *Corporate Social Responsibility* policy (CSR). Berry Bros. General Contractors, Inc. shall respect the rights set forth in the *Universal Declaration of Human Rights* adopted by the United Nations and the *Declaration on Fundamental Principles and Rights at Work* adopted by the International Labor Organization (ILO).

**SUBPART B - POLICY**

BBGCI's *Corporate Social Responsibility Policy* shall include commitments to protect the fundamental rights of workers of BBGCI, any of its subcontractors, and its suppliers. Minimum criteria of the CSR policy includes the following:

- Providing workers with a safe and healthy working environment
- Policies related to hours of work, overtime, compensation and benefits
- Non-discrimination and equal opportunity in labor practices, including hiring and compensation
- Prohibition of Child labor and forced labor, including human trafficking and slavery



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- If collective bargaining rights are recognized by local law, such rights need to be respected on the jobsite
- If collective bargaining rights are not recognized by local law, BBGCI shall not restrict workers from developing alternative mechanisms to express their grievances

**SUBPART C – COMPULSORY LABOR; NON-DISCRIMINATION; FREEDOM of ASSOCIATION**

BBGCI will not, and will use reasonable endeavors to ensure that none of its Subcontractors and its and their suppliers do not use forced or compulsory labor, slavery, or human trafficking in any of its operations, and shall not discriminate with respect to employment and occupation, and shall respect freedom of association and collective bargaining.

**SUBPART D – RIGHTS of CHILDREN**

BBGCI will not, and will use reasonable endeavors to ensure that its Subcontractors and its and their suppliers shall, respect the rights of Children, including as described in the ILO's *Declaration of Fundamental Principles and Rights at Work* by:

- Ensuring that its facilities are not used to abuse, exploit, traffic, or harm Children;
- Ensuring that there is no use of Child or forced labor, slavery, or human trafficking in any its operations;
- Refraining from exploiting Children or engaging them in unacceptably hazardous work or in trafficking, physical punishment, abuse, or involuntary servitude of any of its workers;
- Ensuring that potentially dangerous areas of its facilities do not pose a safety threat to Children;
- Making clear to all staff that it has a zero tolerance policy for violence, exploitation and abuse in all its activities, even when conducted away from its facilities; and
- Taking appropriate action when concerns of possible violence, forced labor, slavery/servitude, trafficking, exploitation, or abuse arise.

“Child” (collectively, “Children”) means an individual whose age is below that of the ILO standard for the minimum age for admission to employment or work definition



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(provided below) or local law, whichever standard provides for a higher minimum age. ILO Convention No. 138 provides that the:

- Basic minimum age for work is fifteen (15) years old, with the possible exception of fourteen (14) years old in certain developing countries;
- Minimum age of “hazardous work” is eighteen (18) years old; sixteen (16) years old under strict conditions;
- Minimum age for “light work” is between thirteen (13) and fifteen (15) years old, with the possible exception for between twelve (12) and fourteen (14) years old in certain developing countries.

### **SUBPART E – SECURITY PERSONNEL**

If BBGCI is providing security personnel as part of the Work, BBGCI shall and will use reasonable endeavors to ensure that its Subcontractors and its and their suppliers shall, provide security in a manner that is consistent with international human rights, guided by the *Voluntary Principles on Security and Human Rights*. All conduct by BBGCI and BBGCI Group shall be in accordance with the United Nation’s *Basic Principles on the Use of Force and Firearms by Law Enforcement Officials* and the United Nation’s *Code of Conduct for Law Enforcement Officials*. Background checks must be performed on all security providers and personnel performing security services. BBGCI’s security providers and BBGCI’s personnel performing security service shall attend security and human rights training as required by Company with reasonable notice to BBGCI.

### **SUBPART F – GRIEVANCE MECHANISM**

In alignment with the requirements of International Finance Corporation *Performance Standard 2 Labor and Working Conditions*, BBGCI shall provide a grievance mechanism for workers and contractors to raise workplace concerns. The grievance mechanism should include the following:

- Address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned without any retribution;
- Allow for anonymous complaints to be raised and addressed, except as prohibited by local applicable law;
- Not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.



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**SUBPART G – ENVIRONMENT HEALTH and SAFETY**

BBGCI is committed to protecting the health and safety of all individuals affected by our activities, including our employees, contractors and the public. BBGCI will provide a safe and healthy working environment, and will not compromise the health and safety of any individual. Our goal is zero accidents and mitigate impacts on the environment by working with our stakeholders, peers and others to promote responsible environmental practices and continuous improvement.

- BBGCI is committed to environmental protection and stewardship
- BBGCI recognizes that pollution prevention, biodiversity and resource conservation are key to a sustainable environment, and will effectively integrate these concepts into its business decision-making
- All employees and contractors are responsible and accountable for contributing to a safe working environment, for fostering safe working attitudes, and for operating in an environmentally responsible manner.

**SUBPART H – COMMUNITY INVOLVEMENT**

BBGCI strives to understand and respect the cultural values and laws wherever we operate. We actively support initiatives in those communities where our employees live and work. This commitment is visible in our contributions of financial, equipment and volunteer support. We encourage our employees to contribute time and energy in leadership and other roles in community organizations.

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Approved By: Joe Berry & Safety Committee

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