

BP-POL-004

Human Rights, Modern Slavery, Child & Migrant Workers Policy

Freely chosen work, ethical recruitment, age protection and worker-centred remedy

Every person connected to Blue Palm’s work must be treated with dignity and must work freely, lawfully and without exploitation.

VERSION	1.0
STATUS	Approved
POLICY OWNER	Nominated Compliance Officer – Mr. Hiua Schuani
APPROVAL AUTHORITY	CEO – Mr. Hiua Schuani
APPLIES TO	Blue Palm personnel and relevant third parties in Federal Iraq, the Kurdistan Region and the UAE/Dubai

1. Purpose and scope

This policy establishes Blue Palm's human-rights and labour-exploitation controls for recruitment, employment, sourcing, logistics and contracted labour. It applies to Blue Palm personnel and to suppliers, recruiters, labour providers, subcontractors and other third parties whose workers support Blue Palm business.

2. Prohibited labour practices

NO EXPLOITATION

Blue Palm prohibits forced or compulsory labour, trafficking, slavery, servitude, debt bondage, prison labour not meeting lawful international safeguards, child labour, coercion, threats, document confiscation and any restriction that prevents a worker from leaving employment in accordance with law.

- No recruitment fee, deposit, bond, wage kickback or payment for access to a Blue Palm job.
- No withholding of wages, identity papers, work permits, bank cards, personal belongings or return travel to control a worker.
- No contract substitution, deceptive recruitment, false job description or material terms that differ from those accepted before travel.
- No threats of denunciation to immigration or other authorities, violence, isolation or penalty used to compel work.
- No unreasonable restriction on movement, accommodation exit, communication or access to personal documents.

3. Child and young workers

3.1 Blue Palm direct employment

Blue Palm's company minimum age for direct employment is 18, even where local law permits non-hazardous work from age 15. Reliable proof of age must be checked before work begins. Original identity documents must be returned immediately after verification.

3.2 Supply-chain standard

Suppliers must not employ anyone below the applicable legal minimum age, which is generally 15 under Federal Iraq Labour Law No. 37 of 2015, Iraqi Labour Law No. 71 of 1987 as applied in the Kurdistan Region, and UAE Labour Relations Law. No person under 18 may perform hazardous work, including driving, loading, work around moving machinery, cold-store hazards, chemicals, dangerous heights, night work or tasks likely to harm health, safety or morals.

Where lawful young work is permitted by a supplier, the supplier must maintain age and medical-fitness records, respect restricted hours and breaks, protect education and assign active supervision.

3.3 Remediation

1. Remove the child or young person from immediate hazard without abandoning them or withholding earned pay.
2. Confirm age and circumstances sensitively; protect privacy and do not expose the individual or family to retaliation.
3. Agree a best-interests plan with qualified local support where available, which may include education, safe income support or lawful non-hazardous work for an eligible young worker.

4. Investigate recruitment and supplier controls, reimburse loss where appropriate and monitor until the remedy is complete.
5. Report to an authority where required or necessary for protection, using specialist legal and safeguarding advice.

4. Fair recruitment and migrant workers

- Use only approved recruiters and labour providers; contractually prohibit worker-paid fees and subcontracting without consent.
- Give material job terms before acceptance and travel, in a language the worker understands; provide Arabic documents where required and Kurdish alongside Arabic for relevant work in the Kurdistan Region.
- Verify work permits and immigration status lawfully. Never use status as a threat or require a worker to perform duties outside authorised terms.
- Pay wages directly, regularly and in full, provide an understandable payslip and ensure deductions are lawful and transparent.
- Allow workers to keep passports and identity documents. Temporary custody at the worker's freely given, written request must be exceptional, secure and immediately reversible.
- Provide equal access to training, promotion, welfare, medical attention, grievance channels and freedom from harassment.
- Where Blue Palm is legally responsible for return travel or repatriation, meet that obligation promptly and without using it to pressure the worker.

5. Supplier and labour-provider due diligence

- Map who recruits, employs, supervises, houses and pays each category of worker supporting Blue Palm.
- Check licences, recruitment chain, fee model, worker contracts, payroll evidence, hours, permits and grievance arrangements.
- Interview workers privately where risk warrants; do not rely only on management records.
- Require prompt notification of labour investigations, trafficking indicators, child workers, mass complaints or unauthorised subcontracting.
- Use corrective action where credible and safe; suspend or terminate where exploitation is severe, concealed, repeated or not remediated.

6. Indicators requiring immediate escalation

- Workers appear unable to leave, speak privately, access documents or control their wages.
- Recruitment debt, wage deductions, deposits, threats, restricted accommodation or unexplained transport control.
- Different contracts at origin and destination, false age documents, very young-looking workers or hazardous young work.
- A recruiter or supervisor holds passports, bank cards, mobile phones or work permits.
- Unpaid wages, excessive involuntary overtime, isolation by language or nationality, or fear of authorities.

A person seeing these indicators must protect immediate safety, avoid confronting a suspected trafficker in a way that could endanger workers, preserve information and escalate under BP-POL-003.

Roles and responsibilities

Role	Core responsibility
CEO	Approves the policy; sets the tone; authorises high-risk exceptions or relationships; ensures adequate resources and independent escalation.
Nominated Compliance Officer	Maintains the legal register, advice channel, risk records and registers; coordinates training, screening, investigations and annual review.
Managers and supervisors	Apply the controls in daily decisions, create a respectful environment, prevent retaliation and escalate concerns without delay.
All workers	Read and follow the policy, complete required training, keep accurate records, ask when unsure and report suspected breaches.
Recruiting manager / labour user	Confirms age, lawful status, understandable terms, no fees and approved recruiter before work begins; monitors actual conditions.
Purchasing / relationship owner	Applies human-rights due diligence and contractual controls to suppliers and labour providers.
Suppliers and recruiters	Maintain lawful, freely chosen employment; disclose recruitment chains; cooperate with worker-centred remediation and audit.

Training, records and monitoring

Training

Induction must cover the parts of this policy relevant to each role. Refresher training is required at least annually for exposed roles and when a material change occurs. Training may be brief and practical, but attendance and comprehension must be recorded.

Minimum records

- Age and right-to-work verification with restricted access.
- Recruiter and labour-provider due diligence; fee declarations; worker contracts and language evidence.
- Worker interviews, payroll/hours samples, grievances, corrective-action and remediation records.

Proportionate indicators

- Percentage of relevant labour providers assessed before use.
- Worker-paid fees identified and reimbursed.
- Age-verification gaps and young-worker findings.
- Forced-labour indicators, grievance themes and completed remedies.

Records must be accurate, access-controlled and retained for the period required by applicable law, contract and Blue Palm's retention schedule. Personal data and sensitive reports must be restricted to those with a legitimate need to know.

Breaches, protection and review

A breach may result in corrective action or discipline up to and including dismissal, subject to applicable law and a fair process. Third-party breaches may lead to remediation plans, suspension, termination, recovery of loss and reporting to a competent authority where required.

Blue Palm prohibits retaliation against anyone who raises a concern, assists an investigation or refuses conduct they reasonably believe would breach law or this policy. Deliberately false or malicious allegations may be addressed through a fair disciplinary process; a concern that is not substantiated is not, by itself, misconduct.

The Nominated Compliance Officer will review this policy at least annually, after a significant incident, and when relevant law, sanctions, licensing conditions or operations change. Material changes require CEO approval.

Legal and standards reference

This section is a concise implementation map, not a complete statement of the law. The current official text, local legal advice and the applicable entity or licence conditions must be checked before relying on a provision.

Instrument	Relevance to this policy
Federal Iraq Labour Law No. 37 of 2015, including Articles 6–7, 10, 16, 23 and 30–35 and 95–105	Prohibits forced labour, sets minimum-age and young-worker protections, regulates labour documents and foreign-worker recruitment in Federal Iraq. official/source text
Iraq Labour Law No. 71 of 1987, as applied in the Kurdistan Region at the policy date	Provides the principal KRI labour framework currently used for minimum age, working time and employment protections; current application must be locally confirmed. official/source text
Iraq Anti-Human Trafficking Law No. 28 of 2012	Criminalises trafficking and provides the Iraqi protection and enforcement framework. official/source text
UAE Federal Decree-Law No. 33 of 2021 Regulation of Labour Relations, as amended	Prohibits forced labour and worker-paid recruitment costs and regulates juvenile and migrant employment in the UAE. official/source text
UAE Federal Decree-Law No. 24 of 2023 Combating Human Trafficking	Current UAE criminal framework against human trafficking. official/source text

Voluntary European and international benchmarks

UN Guiding Principles on Business and Human Rights — [source](#) • ILO Declaration on Fundamental Principles and Rights at Work — [source](#)