

EolMed – Gruissan, Floating Offshore Windfarm

Human Rights Risk Assessment

Risk Assessment (RA)

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STRICTLY CONFIDENTIAL

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Table of content

1	Introduction	4
2	Methodology & Assessment	5
3	Local Context	6
4	Human Rights standards applied:	7
5	Project description	8
6	Stakeholder identification, mapping, engagement	9
7	Description of the Human Rights baseline (including any other relevant baseline data).....	10
8	Identification and evaluation of the Human Rights impacts	13
9	Company Practices.....	14
10	Mitigation measures and residual impacts.....	16
10.1	Labour Rights – Grievance Mechanism and Remedy	16
10.2	Labour Rights – Occupational Health and Safety	16
11	Guidelines for Management and monitoring plan	17
12	Conclusion.....	18
13	Appendices	19

1 Introduction

This document provides an initial scan for, and analysis of, the potential Human Rights Impact of the Eolmed Off-Shore Windfarm project off the coast of Gruissan in the south of France.

The objective of this analysis is as follows:

- To identify the key human rights implications of the potential impacts of the Project's footprint and activities;
- To provide mitigation measures (if required) to reduce the likelihood of these risks occurring;
- To ensure that the rights of stakeholders, directly or indirectly affected by the project, are protected and not adversely affected by the Project, which will help to maintain the social licence to operate the Project and protect the local and international reputation of Eolmed.

2 Methodology & Assessment

The full range of human rights, as defined by the UN Guiding Principles, was taken into account in mapping the project's activities and identifying key issues.

This analysis was used to inform appropriate mitigation measures and help prioritise actions for those that are considered to be significant human rights issues in relation to the human rights issues in relation to the project.

This document is based on the following data collection;

- Desktop review of relevant human rights and required business practices
- Evaluation of the Human Rights context in France
- Review of project documentation including previous management plans, consultation undertaken in earlier phases of the project and the various community consultations undertaken as part of the establishment of Eolmeds Environmental Management Plan
 - Including a review of the local stakeholders of the project
- A desktop review of key contractors publicly available commitments in terms of human rights, ethics and procurement guidelines

The range of Human Rights issues were evaluated with respect to the affected groups; and the outcome of those evaluations, including the level of risk (if any) to the respective affected group was calculated in the Initial Scan Risk Assessment.xls provided as an image in Appendix 1 ; where any impacts were identified possibilities of mitigation were identified and where they may not be mitigated and may instead require other remedial action

3 Local Context

France is a designated country as defined by the Equator Principles Association and has been deemed to have robust environmental and social governance, legislation systems and institutional capacity designed to protect their people and the natural environment. ¹

The French political system features vibrant democratic processes and generally strong protections for civil liberties and political rights. However, due to a number of deadly terrorist attacks in recent years, successive governments have been willing to curtail constitutional protections and empower law enforcement to act in ways that impinge on personal freedoms. ²

The Country Reports on Human Rights Practices for 2020 by the United States Department of State Bureau of Democracy, Human Rights and Labor, on France highlighted the following significant human rights issues:

- violence against journalists (as part of protest coverage);
- criminal defamation laws;
- and societal acts of violence and threats of violence against Jews, migrants and members of ethnic minorities, and lesbian, gay, bisexual, transgender, and intersex persons. ³

None of which have any material impact on the Eolmed Project.

In terms of specific industry risks for both construction and off-shore wind;

The Global Slavery Index rates France as low in both prevalence and vulnerability to all forms of slavery including modern slavery and high in its government response to the issue. Having ratified the European requirements in 2013 France continues to lead the fight against modern slavery.

However, in order to realise a truly sustainable energy transition, the production of wind turbines must not have undue adverse impacts on human rights and the environment. For example, adverse human rights impacts and environmental damage related to the mining of important minerals that are used in the production of wind turbines, such as iron ore and copper, must be avoided. Companies producing wind turbines have a responsibility to behave responsibly and take steps to avoid these impacts. It is also important to note that ActionAidGo⁴ has rated the key supplier for the Eolmed Project as the second highest performing of all major turbine manufacturers in this regard.

This report discusses specific organizational responses to human rights risks below.

Therefore, in terms of local context, it is argued that there is no significant concerns raised in regards to the limited scope of the Eolmed Project and that local and state controls are sufficient in addressing the concerns from a governmental and judicial perspective.

¹ <https://equator-principles.com/about-the-equator-principles/designated-countries/>

² <https://freedomhouse.org/country/france/freedom-net/2021>

³ <https://www.state.gov/wp-content/uploads/2021/03/France-2020-Human-Rights-Report.pdf>

⁴ <https://www.somo.nl/wp-content/uploads/2019/11/Human-Rights-in-Wind-Turbine-Supply-Chains-2019.pdf>

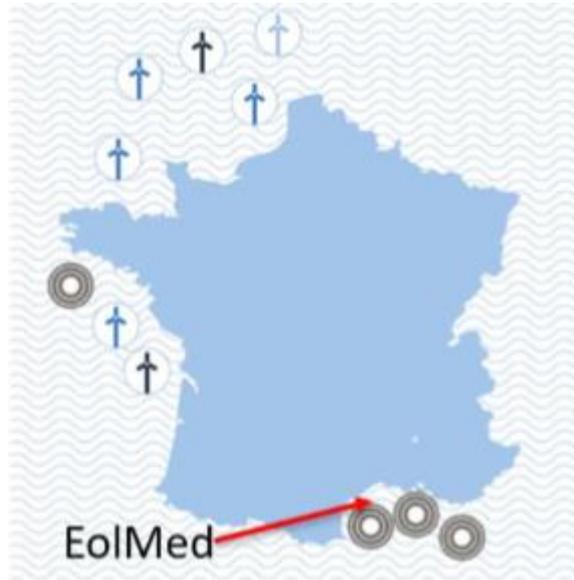
4 Human Rights standards applied:

The benchmark for the assessment are the 'internationally recognised human rights' as outlined in the UN Guiding Principles on Business and Human Rights⁵.

⁵ <https://www.diplomatie.gouv.fr/en/french-foreign-policy/human-rights/business-and-human-rights/>

5 Project description

EolMed project (the “Project”) is a pilot project of a 30MW floating wind farm developed by a consortium of companies and public institutions led by Qair. It is composed of 3 VESTAS V164 of 10MW turbines on floating foundations and 1 floating electrical hub. The Project is located 16km off Gruissan–Port-La-Nouvelle, in the Mediterranean Sea:



The project is a Category B project, Category B projects are those where potential environmental and social impacts are few in number and site-specific

The site designated for construction is being developed by the Port of Port-la-Nouvelle through land reclaimed from the sea and river as part of an extension of the existing industrial port. As a result, there has been no impact on the existing local community residents – as there are none.

Once constructed the turbines will be towed offshore to essentially remove any impact on human activity and human rights. Consultation has been undertaken with local fishermen for the small amount of ocean which will be unexploitable for the period of the pilot project. Once this project has reached the end of its lifecycle it will be entirely dismantled and removed.

In regards to the physical construction site at the port of Port-la-Nouvelle. Peak manpower estimated for the project is 150 spread across a number of subcontractors through the construction phase of the project. The contractors will primarily be French organisations from the local and adjoining regions. While some specialist contractors will be engaged, they are minimal in number and technical experts from key European suppliers such as Vestas. There are no anticipated issues in terms of the usage of migrant workers or minority groups either within the projects key construction phase or its area of influence.

6 Stakeholder identification, mapping, engagement

Through consultation with the project development team and upper management dedicated to public relations/community liaison regarding the project, the Project Environmental Expert and HSE Manager, group HR and IT as well as project documentation the following stakeholders have been identified:

Internal

- Qair Group, and Eolmed employees
- Key business partners (Archimed, JV de Matière - Ponticelli, TOTAL, IDEOL, RTE) and their employees
- EPC and key contractors Employees

External

- Local Residents of Port-la-Nouvelle
- Council of Port-la-Nouvelle
- Port of Port-la-Nouvelle
- Membre du Comité Scientifique du Conseil Maritime de Façade.
- Comité Scientifique du Conseil Maritime de Façade.
- PNR de La Narbonnaise
- l'Association ECCLA et représentante de FNE
- Comité Régional des Pêches Marines et des Élevages Marins (CRPMEM) d'Occitanie.
- La DREAL au titre du service en charge de la réglementation espèces protégées
- La DDTM au titre du service chargé de la police des eaux littorales
- la LPO Aude

Through various phases of the development of the Project consultation was undertaken with the external stakeholders and as a result;

- A scientific consultation committee was put in to place to provide regular monitoring of the environmental impact of the project,
- Regular engagement with local fishermen has been undertaken and is scheduled to liaise with the most significantly affected portion of the local population.

It should be noted that while local fishermen are the most affected portion of the local population, it is an economical and environmental impact which has been addressed through the Environmental Management Impact Assessment and Management plans with associated remediation actions, and not a diminution of their human rights.

7 Description of the Human Rights baseline (including any other relevant baseline data)

As highlighted in section 4 The Local Context the human rights situation in France in general on a high level and local laws are generally well enforced. With examples of high-profile politicians (Presidents and Mayors) being prosecuted on grounds of bribery, corruption, and the like. And with military personnel being pursued through legal avenues for acts infringing on the rights of individuals serving as demonstrable examples of a generally compliant human rights system in place.

Furthermore, legislative controls exist as a fundamental baseline guaranteeing the human rights of all stakeholders of the Eolmed Project.

The Declaration of the Rights of Man and the Citizen was born in the summer of 1789, in France, it serves as a preamble to the first Constitution of the French Revolution of 1791.⁶

The Universal Declaration of Human Rights, signed in Paris on 10 December 1948, and the European Convention on Human Rights, born in Rome on 4 November 1950, claim the same heritage.

France has ratified the eight core conventions of the International Labour Organization:⁷

- the Forced Labour Convention (in 1937);
- the Freedom of Association and Protection of the Right to Organise Convention (in 1951);
- the Right to Organise and Collective Bargaining Convention (1951);
- the Equal Remuneration Convention (1953);
- the Abolition of Forced Labour Convention (1969);
- the Discrimination (Employment and Occupation) Convention (1981);
- the Minimum Age Convention (1990); and
- the Worst Forms of Child Labour Convention (2001).

France has ratified several international human rights treaties, including:

- the International Convention on the Elimination of All Forms of Racial Discrimination (ratified and acceded in 1971);
- the International Covenant on Economic, Social and Cultural Rights (ratified and acceded in 1980) and its Optional Protocol (signed in 2012; ratified and acceded in 2015);
- the International Covenant on Civil and Political Rights (ratified and acceded in 1980) and its Second Optional Protocol aiming at the abolition of the death penalty (ratified and acceded in 2007). France has submitted eight reservations and declarations to this Covenant, including one to article 27 related to the right of minorities to enjoy their 'own culture, to profess and practise their own religion, or to use their own language', on behalf of French Republican universalism. France also submitted a reservation to article 5, paragraph 2(a) of the First Optional Protocol;
- the Convention on the Elimination of All Forms of Discrimination against Women (signed in 1980; ratified and acceded in 1983) and its Optional Protocol (signed in 1999; ratified and acceded in 2000). In accordance with article 29, paragraph 2 of the Convention, France has submitted a reservation declaring it will not be bound to article 29, paragraph 1, related to the resort to arbitration and adjudication in the framework of a dispute between several state parties;
- the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (signed in 1985; ratified and acceded in 1986) and its Optional Protocol

⁶ <https://www.elysee.fr/la-presidence/la-declaration-des-droits-de-l-homme-et-du-citoyen>

⁷ <https://www.lexology.com/library/detail.aspx?g=f57cd2d7-6c3d-4624-9a40-2695014eadfa>

(signed in 2005; ratified and acceded in 2008). In accordance with article 30, paragraph 2 of the Convention, France has submitted a reservation declaring it will not be bound to article 30, paragraph 1, related to the resort to arbitration and adjudication in the framework of a dispute between several state parties;

- the Convention on the Rights of the Child (signed, ratified and acceded in 1990); its Optional Protocols on the involvement of children in armed conflict and on the sale of children, child prostitution and child pornography (both signed in 2000; ratified and acceded in 2003); and its Optional Protocol on a communication procedure (signed in 2014; ratified and acceded in 2016). France construes that article 40, paragraph 2(v), which provides that the decisions and measures related to the violation of the criminal law, should be reviewed by a higher competent, independent and impartial authority or judicial body according to the law. France explains that some offences tried by the police court and some offences of a criminal nature are non-appealable, but that the decisions handed down by the final court of jurisdiction may be appealed before the Court of Cassation, which rules on the legality of the decision;
- the International Convention for the Protection of All Persons from Enforced Disappearance (signed in 2007; ratified and acceded in 2008); and
- the Convention on the Rights of Persons with Disabilities (signed in 2007; ratified and acceded in 2010) and its Optional Protocol (signed in 2008; ratified in 2010).

As for regional human rights treaties, France is a member state of:

- the Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR) (signed in 1950; ratified in 1974). France has submitted some reservations to the ECHR, relating, in particular, to articles 5 and 6 (declaring that they should not be an obstacle to French rules pertaining to the status of the military) and 15 (declaring it will not prevent the application of article 16 of the French Constitution allowing extended powers to be given to the President of the Republic in the event of a crisis);
- Protocol No. 1 to the ECHR (signed in 1952; ratified in 1974);
- Protocol No. 2 to the ECHR, conferring upon the European Court of Human Rights competence to give advisory opinions (signed and ratified in 1981);
- Protocol No. 3 to the ECHR, amending articles 29, 30 and 34 (signed in 1973; ratified in 1974);
- Protocol No. 4 to the ECHR, securing certain rights and freedoms other than those already included in the Convention and in the first Protocol thereto (signed in 1973; ratified in 1974);
- Protocol No 5 to the ECHR, amending articles 22 and 40 of the Convention (signed in 1973; ratified in 1974);
- Protocol No. 6 to the ECHR concerning the Abolition of the Death Penalty (signed in 1983; ratified and entered into force in 1986);
- Protocol No. 7 to the ECHR (signed in 1984; ratified in 1986; entered into force in 1988). France has some reservations to the Protocol, including a reservation to articles 2 to 4 of the Protocol (declaring that only the offences falling within the jurisdiction of the courts ruling in criminal matters under French law shall be regarded as offences within the meaning of these articles);
- Protocol No. 8 to the ECHR (signed in 1985; ratified in 1989);
- Protocol No. 9 to the ECHR (signed in 1990);
- Protocol No. 10 to the ECHR (signed in 1992);
- Protocol No. 11 to the ECHR restructuring the control machinery established thereby (signed in 1994; ratified in 1996);
- Protocol No. 13 to the ECHR concerning the abolition of the death penalty in all circumstances (signed in 2002; ratified in 2007; entered into force in 2008);
- Protocol No. 14 to the ECHR, amending the control system of the Convention (signed in 2004; ratified in 2006);
- Protocol No. 15 amending the ECHR (signed in 2013; ratified in 2016 as a member state to the ECHR); and

- Protocol No. 16 to the ECHR (signed in 2013; ratified in 2018).

Regarding industry and business more specifically, in 2016, the French government issued the law on transparency, the fight against corruption and the modernisation of economic life - known as the Sapin II Law - which notably imposes a duty of vigilance on companies with a substantial presence in France. This legislation also requires the establishment of a corruption prevention plan that includes a comprehensive mapping of corruption risks across all activities (national and international).

Finally, in 2017, the French government passed a second law specifically targeting the duty of vigilance (the law on the duty of vigilance of parent companies and outsourcing companies), which requires companies to set up a compliance plan to measure and control ethical, social and environmental risks in their international supply chain.

8 Identification and evaluation of the Human Rights impacts

With this baseline, and frame of reference for human rights in mind, Eolmed undertook a review of the Human Rights risks to which the project is connected based on severity and likelihood, noting where risks intersect or are interrelated, and emphasizing which vulnerable people/groups may be at risk (e.g., Indigenous Peoples; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families)

The table below provides a summary of potential human rights issues/risks:

Rights category	Human Rights issue	Impact Severity on Eolmed Project
Labour	Child Labour	N/A
	Collective bargaining and Freedom of association	Low
	Modern Slavery (Forced Labour/Human Trafficking)	Low
	Grievance Mechanism and Remedy	Medium
	Job Security/Right to Work	Low
	Non-discrimination	Low
	Occupational health and safety	Medium
	Wages (pay equity, standard of living)	Low
	Working Hours	Low
Civil and Political	Freedom of expression	Low
	Right to life and security of person	N/A
	Privacy	Low
Economic, Social, and Cultural	Right to education	N/A
	Right to health	Low
	Right to participate in the cultural life of the community	N/A
	Right to Water	N/A
	Social Insurance	Low
Group Rights/ 'Heightened Risk of Vulnerability'	Children's Rights	N/A
	Disability Rights	Low
	Indigenous Peoples	N/A
	Migrants Rights	N/A
	Women's Rights	Low

Existing mitigation measures are those that are integrated into the project design and management processes. These measures are not exclusive to the Human Rights Analysis and some may coincide with other measures in the Environmental Management Plan (Plan d'Assurance Environmental)

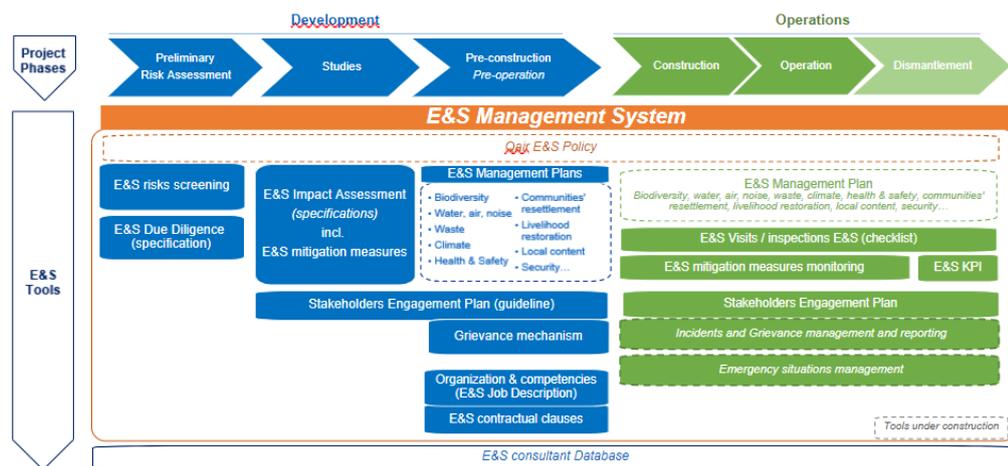
Additional mitigation measures are those proposed in Section 10 below to further mitigate potential risks.

9 Company Practices

Qair Group has a history of developing and operating PV and Wind Farm parks across the world in accordance with the requirements of international lenders, regulations, Equator Principles (EP) & IFC Standards.

At a group level there is a designated Sustainability Team with an Environmental and Social Manager, working jointly with the QHSE Manager and durable development lead to:

- Compliance with local regulations and/or IFC performance standards
- Conduct E&S risks/impacts project assessment
- Monitor project E&S mitigation measures implementation
- Implement project E&S Management System (ESMS)
- Manage and report incidents and emergency situations
- Provide annual E&S monitoring report
- Request E&S commitment from our strategic counterparties, contractors & suppliers
- Implement a process for verifying the reputation of our co-investors on E&S
- Implement a procurement process which takes human rights performance into account and sets the requirements and expectations for its supply chain



At an Eolmed Project level and consistent with the requirements for designated countries and the level of Human Rights risks posed to and by the project; local stakeholders were engaged with to shape Qair Groups overarching CSR strategy, in addition to contributing to the environmental assessment and development stages of the Eolmed Project.

Active community engagement was also undertaken with affected groups (fishermen) local council and regional government.

Eolmeds key contractor and EPC for the construction of the floating foundations and management of the construction site– JV Matière-Ponticelli, has publicly engaged⁸ on the issue of human rights, and has published its Ethical Code of Conduct highlighting the engagements it has taken and how it applies and manages risks on the matter.

⁸ <https://www.ponticelli.com/wp-content/uploads/2018/09/ETHICAL-CODE-OF-CONDUCT.pdf>

Most materially ;

- Respect of labour law Respecting laws concerning people, freedom of association, the right for collective representation and diversity contribute to efficient, high-quality, working relationships.
- Non-discrimination No distinction between people can be based on geographical or ethnic origin, religion, sex, physical appearance, age, health, political and trade union opinions, sexual orientation or disability. These non-discrimination principles apply in the fields of recruitment, mobility, qualification, remuneration, promotion, membership of trade unions, training and working conditions. Universal declaration of Human Rights (articles 1 and 2) and article 225 of France's criminal code
- Protection in respect of forced labour and child labour Extreme vigilance is paid in respect of:
 - Forced labour: The Group supports the fight against it and, in particular, while choosing our partners. As a reminder, forced labour is defined as work performed under constraint or threat.
 - Child labour: The Group respects the age limit fixed by national legislation and will never make a child under 16 years of age work (with the exception of observation internships as part of school curricula). International Convention (n°29) of the International Labour Organisation (ILO) of 1930 International Convention of the United Nations of 1989 for the protection of children ILO Convention on the worst forms of child labour (1999) ILO Convention on minimum working age (1973)

Vestas the other key contractor for the provision, and installation of the wind turbines has been ranked by ActionAid, in their Human rights in wind turbine supply chains Update 2019 report as an industry leader in the turbine market. In 2020 they were rated as Denmark's leading company in terms of human rights.

Vestas implements a recruitment framework and internal code of conduct with monitoring across the globe Specifically withing its' own supply chain for construction and service sites vestas has undertaken their own Human Rights Impact Assessment and determined that Forced Labour was not a salient human rights risk, but notes that they have set up a specific system to monitor the risk associate with conflict minerals several tiers down its own supply chain.

Vestas implements a multi-step Due Diligence process to manage the risks related to human rights and modern slavery as indicated in their statement available online.

- 1 Pre- Screening
2. Self-Assessment
3. Supplier Creation
4. On-Site Assessment of Suppliers
5. Management of Supplier Performance.

It should be noted that the countries of fabrication for the turbines, towers and nacelles to be used on the Eolmed Project are anticipated to occur in: Denmark, Germany, Spain or the UK All of which are comparable with France in terms of their human rights engagements and requirements.

10 Mitigation measures and residual impacts

Given the context of Human Rights in France and the limited scope of the Eolmed project the initial scan identified no significant impact on the Human Rights of stakeholders to the Eolmed Project.

Only two areas of medium impact severity were identified and these are discussed below:

10.1 Labour Rights – Grievance Mechanism and Remedy

It is proposed that Eolmed proceed with the implementation of its grievance mechanism which, once established will in the due course of the projects development, appropriately monitor any residual impact on the human rights of the project's stakeholders and employees and allow a mechanism of communication and monitoring for any eventual issue requiring remedy.

10.1.1 Remedy - Economic Impact and Compensation to Local Fishermen

It bears mentioning that as part of the impact studies undertaken in the preliminary phases of the development of the project there was an economic impact identified from the reduction in available exploitable waters as a result of the creation of a maritime exclusion zone for the project. There is a program of compensation (both financial and other) which has been put in place as a result and which is being monitored through the environmental management plan.

10.2 Labour Rights – Occupational Health and Safety

While the labour right of Occupational Health and Safety was identified as having a potential medium impact severity, the controls in place both through local labour laws; project design, and the OHS systems put in place both by Eolmed; and its key contractors, it is believed to be appropriately managed through existing controls and no further mitigation measures are proposed.

11 Guidelines for Management and monitoring plan

Given the relatively minor significance of Human Rights Risks, it is proposed that the Eolmed project manage the subject through the establishment of its external grievance process through the update of the Eolmed website as the project progresses.

Where any complaint, report, or suspicion of a breach of any stakeholders' human rights is confirmed or identified Qair/Eolmed will treat it in accordance with internal procedures and review this document and existent controls if deemed appropriate.

All other relevant aspects of human rights will be managed and monitored in accordance with site specific QHSE policies and procedures and in strict collaboration with the projects major contractors and stakeholders.

12 Conclusion

With a view towards France's strong engagement on the matters of Human rights, coupled with local laws and controls it is argued that the local context poses little risk to the human rights of employees and community stakeholders. Further, the absence of vulnerable groups in the proximity of the site lessens the possibility of significant human rights breaches.

Qair Groupe, Eolmed, and its key contractors' engagements, policies and processes further limit the likelihood of negative impact with regards to local stakeholders human rights.

As a result, it can be concluded that the initial scan the Project confirms that it is of a lower risk and the identified human rights risk can be managed through existing internal controls and that no further consultation or in-depth review is required.

13 Appendices

The spreadsheet version of the following risk assessment is available [here](#)

EolMed – Gruissan, Floating Offshore Windfarm

Rights category	Human Rights Issue	Example of related potential negative impact/risk:	Risk to workers	Risk to Affected Community members	Vulnerable Group identified in Project Stakeholders	French Legal Controls	Materiality to EolMed Project					Controls in place
							Scale	Scope	Remediability	Likelihood	Impact Severity	
Labour	Child Labour: ILO standards prohibit hazardous work for all persons under 18 years. They also prohibit labour for those under 16 with limited exceptions for developing countries. (Intersects with the rights of children and education).	<ul style="list-style-type: none"> Business activities that involve hazardous work (such as mining) performed by persons under the age of 18. Where child labour is discovered, a company can negatively impact other rights (such as the rights to an adequate standard of living, or security of the person) if they fail to take account of the best interests of the child in determining the appropriate response. For example, simply dismissing the child (or cutting the contract with the relevant supplier) may result in the child being exploited in other ways (such as prostitution). 	V	V	No	Robust	Low	Nil	N/A	Low	N/A	Contractual references to not employing minors
	Collective bargaining and Freedom of association: Collective bargaining: individuals have the right to form or join trade unions of their choice. Trade unions must be permitted to function freely, subject only to limitations that are in line with international Human Rights standards. Workers have the right to strike, in conformity with reasonable legal requirements. These exist in order to promote negotiation between organized workers and their employer or employers to determine wages, hours, rules, and working conditions. Freedom of Association: Protects the right to form or join all types of associations, including political, religious, sporting/recreational, non-governmental, and trade union associations. This freedom of individuals to associate can be an end in and of itself, or as a means of pursuing common objectives.	<ul style="list-style-type: none"> Creating barriers to the formation of trade unions among employees or contract workers. Refusing or failing to recognize legitimate workers' associations with which the company can enter into dialogue in countries that prohibit trade unions. Operating in an area where the State seeks to undermine a local political party that opposes the company's activities by bringing false accusations against its leaders. 	V		No	Robust	Low	Low	Low	Low	Low	Commitments from key suppliers French legal framework and low risk in local industry esp. Skilled workforce engaged Relatively small and local supply chain for construction
	Modern Slavery (Forced Labour/Human Trafficking): Slavery exists when one human effectively owns another. Freedom from servitude covers other forms of severe economic exploitation or degradation, such as in the trafficking of workers or debt bondage. Rights to freedom from slavery and servitude are absolute rights. Forced or compulsory labour is defined by the ILO as all work or service that is extracted under menace of any penalty and for which the person has not voluntarily offered themselves. Providing payment does not mean that work is not forced labour if the other aspects of the definition are met.	<ul style="list-style-type: none"> Businesses may unknowingly benefit through their supply chains from the labour of workers who have been trafficked and are forced to work, for example, in factories. Women and children may be subject to particularly severe impacts in such situations. A company may be involved in the transportation of people or goods that facilitates the trafficking of individuals. Forced labour can arise in any sector where an employer puts workers in a position of debt. 	V		No	Robust	Low	Nil	Low	Low	N/A	Commitments from key suppliers French legal framework and low risk in local industry esp. Skilled workforce engaged. Robust hiring mechanisms Relatively small and local supply chain for construction
	Grievance Mechanism and Remedy: All people have the right to remedy when their rights have been violated. Where business enterprises identify that they have caused or contributed to adverse Human Rights impacts, they should provide for or cooperate in their remediation through legitimate processes, whether through the company's own operational-level grievance mechanism or through cooperation with independent (non-judicial) mechanisms.	<ul style="list-style-type: none"> Not providing processes to identify (e.g. grievance mechanism) and then remediate adverse Human Rights impacts which the company causes or contributes to. Risk that employees do not understand/ trust the grievance mechanism (and therefore will not use it) 	V	V	No	Robust	Low	Medium	Low	Medium	Medium	Internal and external grievance process to be established and communicated.
	Job Security/Right to Work: The termination of an employment relationship is likely to be a traumatic experience for a worker and the loss of income has a direct impact on her or his family's well-being. As more countries seek employment flexibility and globalization destabilizes traditional employment patterns, more workers are likely to face involuntary termination of employment at some point in their professional lifetime. The employment of a worker should not be terminated unless there is a valid reason for such termination connected with the worker's capacity or conduct or based on the operational requirements of the undertaking, establishment, or service. Even where such practice may be legally permissible under local law, many stakeholders now expect companies to exhibit a higher standard of behavior in line with international standards and good practice.	<ul style="list-style-type: none"> Arbitrarily or unfairly dismissing a worker, even if permissible under local law. Hindering or failing to provide for the reasonable career advancement aspirations of workers. Risk that workers will be on a series of short-term contracts preventing them from enjoying the benefits associated with long term employment. 	V		No	Robust	Low	Low	Low	Low	Low	Internal HR Processes of both Quir/Eolmed and key suppliers French employment law
	Non-discrimination: The practice of ensuring equal treatment and respect for all individuals regardless of class, race, color, sex, religion, gender, age, political or other opinion, national or social origin, property, sexual orientation, disability, employee status, marital status, familial connection, etc. Includes ensuring employees are free from harassment.	<ul style="list-style-type: none"> This can come up in a variety of circumstances. It is the risk that workers may be treated unfairly (either through recruitment, hiring, management, compensation, career progression/ opportunities, or termination practices) due to certain attributes such as on the basis of their disability, religion, health, ethnicity, gender, sexual orientation, gender, age, indigenous origin, migrant worker status, etc. (by such, it intersects with other rights e.g. right to health). 	V		No	Robust	Low	Low	Low	Low	Low	Internal HR Processes of both Quir/Eolmed and key suppliers French employment law
	Occupational health and safety: A company should provide safe and healthy working conditions to workers. ILO standards require governments to adopt, in consultation with appropriate employer and employee organizations, a national occupational health and safety ("OHS") policy aimed at reducing accidents and injuries to health arising in the course of employment, and to minimize the causes of inherent workplace hazards. That policy should address, for example, the provision of adequate OHS training regarding the use and maintenance of the 'material elements of work', including workplace environment, tools, machinery and equipment. Workers must be able to remove themselves from work situations where imminent and serious health dangers are reasonably perceived, without undue consequences (intersects with the right to enjoy just and favorable conditions of work).	<ul style="list-style-type: none"> Failing to address a pattern of accidents highlighting inadequate workplace health and safety. Risk that workers will face physical harm during the work commute. 	V		No	Robust	Medium	Medium	High	Low	Medium	Project design and implementation with HSE at the forefront of planning Internal HSE Processes of both Quir/Eolmed and key suppliers French employment law
	Wages (pay equity, standard of living): A company must protect the right to remuneration that provides workers with fair wages and equal remuneration for work of equal value. Remuneration must also be enough to provide workers with a decent living for themselves and their families. A minimum wage should be 'fair' and enable families to enjoy the right to a standard of living that includes adequate food, clothing and housing (connects with the right to adequate standard of living for health and well-being).	<ul style="list-style-type: none"> Using cleaning staff that are employed by a third-party company and are paid extremely low wages with no or very limited entitlements to sick pay or leave. Risk that low compensation may undermine worker's ability to have an adequate standard of living. 	V		No	Robust	Low	Low	Low	Low	Low	Internal HR Processes of both Quir/Eolmed and key suppliers French employment law
	Working Hours: The degree of flexibility for employees to start and end the work day in order to manage familial and personal obligations, while adequately fulfilling their employment duties.	<ul style="list-style-type: none"> Mandating unreasonable working hours for employees that are inconsistent with ILO standards, which generally indicate that employees should not be required to work more than 48 hours per week, or ten hours a day, and should have one day off per seven days. Company practices hinder the ability of workers to adopt a healthy work-life balance that enables them to adequately support their families, such as requiring workers to live on site in dormitories for extended periods of time without providing adequate periods of leave to enable them to spend time with their families (intersects with the rights to family, rest and leisure). 	V		No	Robust	Low	Low	Low	Low	Low	Internal HR and HSE Processes of both Quir/Eolmed and key suppliers French employment law

Civil and Political	<p>Freedom of expression:</p> <p>➤ The right to hold opinions free from outside interference is an absolute right, with narrow restrictions by States only permissible when in line with international Human Rights standards. Individuals have a right to seek, receive and impart ideas in whatever media or form they choose.</p>	<p>➤ Not allowing workers to express their opinions freely, or unfairly punishing them for doing so.</p> <p>➤ Operating in a country where workers are routinely prevented by law from expressing their opinions in the public domain.</p> <p>➤ Censoring online or other content at the demand of the State where those requests are illegal under national law and/or not in line with international Human Rights standards.</p> <p>➤ Engaging in litigation against individual workers, community members or Other Stakeholders who have spoken critically about the company where there is an extreme imbalance in the parties' means to fund a legal case.</p>	✓	✓	No	Robust	Low	Low	Low	Low	Low	Internal HR Processes of both Qair/Eolmed and key suppliers French employment law
	<p>Right to life and security of person:</p> <p>➤ Individuals have the right not to be deprived of life arbitrarily or unlawfully. This includes the right to have one's life protected, for example, from physical attacks or health and safety risks.</p>	<p>➤ The lethal use of force by security forces (State or private) to protect company resources, facilities, or personnel.</p> <p>➤ Operations that pose life-threatening safety risks to workers or neighboring communities through, for example, exposure to toxic chemicals.</p>	✓	✓	No		N/A	N/A	N/A	N/A	N/A	Not applicable to project scope or country of operation. Stringent HSE controls and processes Project designed to limit risk during
	<p>Privacy:</p> <p>➤ Individuals have a right to be protected from arbitrary, unreasonable or unlawful interference with their privacy, family, home or correspondence and from attacks on their reputation. The State is allowed to authorize restrictions on privacy in line with international Human Rights standards, but 'arbitrary' restrictions are always prohibited.</p>	<p>➤ Failing to protect the confidentiality of personal data held about employees or contract workers, customers or other individuals.</p> <p>➤ Requiring pregnancy testing as part of job applications.</p> <p>➤ Providing information about individuals to State authorities, without that individual's permission, in response to requests that are illegal under national law and/or not in line with international Human Rights standards.</p>	✓	✓	No	Robust	Low	Low	Low	Low	Low	Internal HR Processes of both Qair/Eolmed and key suppliers French employment law IT Security practices in place
Economic, Social, and Cultural	<p>Right to education:</p> <p>➤ All children have the right to free and compulsory primary education. The right also includes equal access to education and equal enjoyment of educational facilities, among other aspects.</p>	<p>➤ The presence of child labour in a business or in its supply chain, where those children are unable to attend school (intersects with rights to be free from all forms of slavery).</p> <p>➤ Limiting access to, or damaging, educational facilities through construction, infrastructure, or other projects.</p>	✓	✓	No	Robust	N/A	N/A	N/A	N/A	N/A	Not applicable to project scope or country of operation.
	<p>Right to health:</p> <p>➤ Individuals have a right to the highest attainable standard of physical and mental health. This includes the right to have control over one's health and body, and freedom from interference.</p>	<p>➤ Failure to implement appropriate health and safety standards leads to long-term negative impacts on workers' health.</p> <p>➤ Pollution from business operations can create negative impacts on the health of workers and/or surrounding communities.</p>	✓	✓	No	Robust	Low	Low	Low	Low	Low	Internal HSE Processes of both Qair/Eolmed and key suppliers French employment law Environmental Management Plan and Monitoring in place
	<p>Right to participate in the cultural life of the community:</p> <p>➤ Individuals have a right to take part in the cultural life of society and enjoy the benefits of scientific progress, especially disadvantaged groups.</p>	<p>➤ Activities involving resource extraction or new construction (such as laying a pipeline or installing infrastructure networks) could impact this right by separating groups from areas of cultural importance and knowledge, or by damaging their cultural heritage.</p>	✓	✓	No	Robust	N/A	N/A	N/A	N/A	N/A	Not applicable to project scope or country of operation.
	<p>Right to Water:</p> <p>➤ Individuals have the right to water and sanitation</p>	<p>➤ Companies cutting off access to existing water supplies, or making existing supplies non-potable, undermine the right to water (intersects with the right to health)</p> <p>➤ Denying workers their contractually agreed employment injury benefits.</p>	✓	✓	No	Robust	N/A	N/A	N/A	N/A	N/A	Not applicable to project scope or country of operation.
	<p>Social Insurance:</p> <p>➤ This right obliges the State to create and maintain a system of social security that provides adequate benefits for a range of issues (such as injury or unemployment).</p>	<p>➤ Offering a private social security scheme that has discriminatory eligibility criteria.</p>	✓		No	Robust	Low	Low	Low	Low	Low	Requirement in France. Not applicable or impacted by project scope.

Group Rights/ Heightened Risk of Vulnerability	<p>Children's Rights:</p> <p>➤ The Convention on the Rights of the Child establishes global standards to ensure the protection, survival, and development of all children, without discrimination.</p>	<p>➤ Permitting children to work in a manner that is inconsistent with international labour standards (intersects with prohibition on child labour and right to education).</p> <p>➤ Forcing parents to work excessive hours infringing on their ability properly parent (intersects with the right to family).</p> <p>➤ Where child labour is discovered, a company can negatively impact other rights (such as the rights to an adequate standard of living, or security of the person) if they fail to take account of the best interests of the child in determining the appropriate response. For example, simply dismissing the child (or cutting the contract with the relevant supplier) may result in the child having to find alternative, more dangerous forms of work (such as prostitution).</p>		√	No	Robust	N/A	N/A	N/A	N/A	N/A	N/A	Not applicable to project scope or country of operation. Supply chain commitments
	<p>Disability Rights:</p> <p>➤ The Convention on the Rights of Persons with Disabilities promotes global standards intended to protect the rights and dignity of people with disabilities in and outside of the workplace.</p>	<p>➤ Refusing to hire workers due to disabilities (intersects with the right to be free from discrimination).</p>	√	√	No	Robust	Low	Low	Low	Low	Low	Low	National laws preventing. Internal HR policies and controls
	<p>Indigenous Peoples:</p> <p>➤ Indigenous Peoples are afforded unique group rights under international law that permits them to give or withhold their consent to projects that may impact them under certain scenarios.</p>	<p>➤ Engaging in business activities on land or cultural heritage sites that has traditional significance to the Indigenous Peoples that inhabit an area when that land was acquired by Government without due consultation and consent with the local population.</p>		√	No	Robust	N/A	N/A	N/A	N/A	N/A	N/A	Not applicable to project scope or country/region of operation.
	<p>Migrants Rights:</p> <p>➤ The International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families establishes how migrant workers and their families should be protected.</p>	<p>➤ Permitting migrant workers to pay a recruitment fee that places them in debt bondage (intersects with the right to be free from all forms of slavery).</p> <p>Ø Providing dormitories for migrant workers that lack proper hygienic safety standards (intersects with rights to health, safety, and adequate standard of living).</p>	√		No	Robust	N/A	N/A	N/A	N/A	N/A	N/A	Not applicable to project scope or workforce
	<p>Women's Rights</p> <p>➤ The Convention on the Elimination of all Forms of Discrimination Against Women exists to promote women's rights and their protection.</p>	<p>➤ Company policy discriminates against women on the basis of their marital or reproductive status (intersects with rights to health and family).</p> <p>➤ A company offers compensation to men and women in a situation where its operations or products have had negative impacts on their health in a way that discriminates against women (such as by failing to recognize the particular harm to their reproductive health) (intersects with right to free from discrimination).</p> <p>➤ Business activities pollute or threaten existing water resources in a way that significantly interferes with local communities' ability to access clean drinking water. In such situations, there may be particular negative impacts on women and girls, who are responsible for water collection in many communities (intersects with rights to health and adequate standard of living).</p>	√	√	No	Robust	Low	Low	Low	Low	Low	Low	National laws preventing. Internal HR policies and controls No impact on reproductive health identified.