

Urenco Human Rights Policy

Urenco's commitment to respecting human rights

Urenco is committed to conducting business operations in a manner that respects the human rights and dignity of its employees and all people, endeavouring to comply with all laws, regulations, and company requirements as outlined in Urenco's [Code of Conduct](#).

This policy defines human rights as encompassing, at the very least, all internationally recognised rights outlined in the International Bill of Human Rights, including the Universal Declaration of Human Rights, coupled with the International Labour's Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work. Urenco are committed to respecting the human rights outlined in these international standards and expect Urenco's employees, suppliers, customers, and other third parties to uphold these same standards.

As part of this commitment, Urenco is a signatory of the United Nations Global Compact and is working towards aligning with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Where national law differs with international human rights standards, Urenco commits to respecting the higher standard. Where there is conflict between the two, Urenco aims to respect international standards to the greatest extent possible.

This policy covers Urenco Limited and its' subsidiaries and outlines Urenco's commitment to respecting the human rights of all people in Urenco's sphere of influence understanding Urenco's role as a reliable strategic partner to customers, governments, and societies. Where human rights are negatively impacted, the severity of the harm, Urenco's connection to the harm, Urenco's leverage, and the relative context, informs how Urenco engages in remedy.

Urenco's approach

As a uranium enrichment company, Urenco recognises its influence and impact on the human rights of a wide range of stakeholders, including through Urenco's role as an employer, purchaser, provider of goods and services, and supporter of local communities.

Urenco implements this policy commitment, through its human rights due diligence processes, which include:

- Identifying and assessing actual and potential impacts,
- Ceasing, preventing, or mitigating adverse impacts,
- Tracking and monitoring at least once a year and on an ad hoc basis,
- Communicating how impacts are addressed and maintaining documentation, and
- Providing for or co-operating in remediation, where appropriate.

In line with the UN Guiding Principles on Business and Human Rights (UNGPs), Urenco recognises that all human rights impacts must be addressed over time. However, good practice allows companies to prioritise attention to those potential impacts that could be most severe in terms of scale, scope, or irremediability. Working with an external third party, Urenco conducted a saliency assessment to identify potential human rights risks with five identified as requiring immediate focus. The methodology and prioritisation were independently and externally reviewed.

This prioritisation informs where Urenco focuses initially, with other identified risks addressed over time. Urenco will continue to monitor, assess, and address all human rights risks across its operations and value chain. The following section sets out, at a high-level, Urenco's commitments and approach towards the five priority potential salient risks.

1. Health, safety, and Wellbeing

Urenco prioritises safety as a core value. Safety is Urenco's top priority.. Urenco is committed to keeping its people, the community, and the environment safe and secure from harm, and ensuring the highest standards of health, safety, and wellbeing. In addition to the framework of robust safety procedures and policies in place at group-level and local site-level, Urenco has invested in programmes to strengthen its safety culture, including training. [Urenco's Code of Conduct](#) also highlights Urenco's expectations of employees and contractors relating to health and safety. Read more about Urenco's health, safety, and wellbeing programmes in Urenco's [Annual Report](#).

2. Right to a clean, healthy, and sustainable environment

Urenco's vision is a sustainable net zero world, and it acknowledges how environmental degradation can lead to adverse impacts on human rights. Urenco commits to respecting the right to a clean, healthy, and sustainable environment, and has environmental management systems at all Urenco's sites. Urenco is committed to ensuring no contribution to harmful soil change, water pollution, air pollution, harmful emissions, degradation of land, noise emissions, or excessive water consumption. In addition, Urenco is committed to the prohibition of improper handling, collection, storage, and disposal of waste, as well as importing and exporting of hazardous waste as defined by the Basel Conventions. Further information on Urenco's approach to managing environmental risks can be accessed in Urenco's [Annual Report](#).

3. Labour rights

Urenco does not tolerate child labour, forced labour, including prison labour, or any use of force or other forms of coercion, or other means to achieve control over another person for the purpose of exploitation, and fully respect all applicable laws establishing a minimum age for employment.

Urenco also acknowledges and upholds employees' rights to join trade unions, engage in collective bargaining, enjoy freedom of association, and commit to working to eliminate discrimination and harassment. Urenco does not accept any discrimination with regard (but not limited) to: National and ethnic origin, social background, colour, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, payment of unequal wages for equal work, or other protected characteristics. Urenco commits to treating people fairly and equally through its Culture programme. Urenco is also committed to providing fair working hours and pay at or above the living wage for Urenco's direct employees. Urenco abides by all laws and regulations and support the ILO's Declaration on Fundamental Principles and Rights at Work.

Urenco's [Code of Conduct](#) outlines Urenco's expectations of employees to respect, promote, and protect labour rights in Urenco's operations and value chains, and Urenco's [Supplier Code of Ethics & Conduct](#) outlines Urenco's expectations of suppliers and contractors.

Through its risk-based approach to due diligence, Urenco seeks to identify potential human rights impacts in its business activities and its supply chain, as well as work to eliminate those impacts and prevent and mitigate any adverse human rights impacts.

4. Security and sourcing risks

Safety and security are top priorities for Urenco. Urenco acknowledges that there are nuclear security risks related to its business, which could adversely impact upon the human rights of its employees, workers in the value chain, and local communities. Urenco has a robust security strategy to mitigate these impacts, including periodic test inspections by nuclear regulators and frequent security exercises. Urenco also recognises the uranium ore purchased has the potential to be sourced from conflicted-affected and high-risk areas, and therefore workers in the value chains may be exposed to elevated human rights impacts, including risks related to public and private security forces. Urenco has identified sourcing risks related to these countries and conduct enhanced due diligence accordingly on mines and mine operators. Urenco also prohibits the improper use of private or public security forces to protect company resources.

5. Access to remedy

Urenco recognises the rights of people in Urenco's operations, value chains, local communities, customers, and end-users, to access remedy. See below for further details.

- Grievance mechanism and remediation

Urenco maintains an independent whistleblowing mechanism called Speak-Out to ensure employees, customers, suppliers, and any other stakeholders can report behaviours that are wrong, illegal, or place people at risk, without fear of retaliation. The Speak Out mechanism can be accessed via a free phoneline and online portal across multiple languages, and is a confidential service, which support anonymous reporting where required. Urenco is committed to ensuring impartiality when reviewing complaints, aligning with legislative requirements in the jurisdictions it operates in, and promoting a speak-out culture in which individuals feel empowered to report concerns.

Urenco continuously seeks to improve the management of the Speak-Out mechanism, and training is provided for all Urenco staff on an annual basis.

- Governance and accountability

Urenco's CEO is the executive sponsor for sustainability and is ultimately accountable for implementation of the sustainability strategy. Governance and oversight are provided by the Executive Committee and Sustainability Committee of the Board of Directors of Urenco Limited. The General Counsel is the Executive Sponsor for Governance, including human rights, and therefore is the responsible individual. Day-to-day responsibility for managing human rights impacts and risks, including the implementation across customers and suppliers, has been assigned to the Corporate Compliance function.

The following section sets out, Urenco's commitments and approach towards the additional identified potential salient risk. Cultural, community, and Indigenous rights

It is recognised that Urenco's operations and value chains may impact local communities and Indigenous Peoples respectively, and Urenco is committed to respecting their rights, including Indigenous People's right to Free, Prior, and Informed Consent (FPIC), as outlined in the United Nations Declaration on the Rights of Indigenous Peoples. Urenco commits to prohibiting the unlawful eviction and deprivation of land, forests, and water bodies when acquiring, developing, or otherwise using land, forests and waters. To mitigate community impacts in its operations, Urenco implements health, safety, environmental, and security controls outlined above and actively engage with nearby communities. Additionally, Urenco acknowledges that some uranium ore Urenco purchase may be sourced from mines located in or nearby Indigenous-owned areas, and Urenco engages on this topic with Urenco's direct suppliers and industry working groups.

6. Privacy and cyber security

Urenco is committed to protecting the privacy and confidentiality of its people, clients, suppliers, and other third parties. Urenco includes provisions in its [Code of Conduct](#) around information security, personal data, privacy, and security and has ISO 27001 Information Security accreditation in parts of its business. More on Urenco's approach to privacy and cyber security can be found in Urenco's [Code of Conduct](#) and Urenco's [Annual Report](#).

A cross-functional team led by Corporate Compliance are responsible for overseeing the implementation of Urenco's Human Rights Policy. This policy will be reviewed every 12 months for relevance and effectiveness.

Non-compliance with this policy by Urenco employees may be treated as a disciplinary matter. Persistent failure to comply with this policy, failure to remedy a breach in a reasonable timeframe, or repeated and unjustified refusal to provide required information may result in the suspension or termination of suppliers.