



ESPY TECHNICAL SERVICES LIMITED
LABOUR RIGHTS
POLICIES AND PROCEDURES



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LABOUR RIGHTS

Introduction:

The ESPY Technical Services Limited Charter: Transforming Our World.

1. ESPY Technical Services Limited is fully committed to the 2030 Sustainable Development Goals of the United Nations, as outlined in the Resolution adopted at the United Nations General Assembly Seventieth Session, Agenda items fifteen (15) and One Hundred and Sixteen (116) on the 25th of September 2015. We are aware that our actions can have a significant impact on achieving these goals.
2. ESPY Technical Services Limited is an analytical think tank of professionals. We are skilled in Health-related engineering and technology, operations management, facilities systems, and procurement processes. We work in conjunction with our sister company, ESPY Technical Services Limited, which has sourced equipment, parts, and services products for the public and private sector in Trinidad.
3. ESPY Technical Services Limited provides comprehensive Healthcare solutions to our local and regional medical sectors in alignment with SDG 3. Our mission is to foster the continuous development of leaders and organisations within the medical industry, while actively pursuing strategically sustainable engineering solutions that benefit humanity.
4. Research and development with a clear focus on complete patient healthcare needs, our company shall promote and foster the latest technological advancement(s) that serve our customers within the Americas. Our core objectives are as follows:
 - i. To provide healthcare Technology management and clinical Engineering solutions to the Caribbean.
 - ii. The provision of medical device services and sales for the Caribbean through our affiliates and manufacturers.
 - iii. To be the market leader in the development, sales, and services of Medical 3D printing for the Caribbean.

Partnership for the Goals

5. ESPY Technical Services Limited is committed to the United Nations Global Compact and the Sustainable Development Goals. We have partnered with The Quantum



Foundation (TQF), a non-governmental, non-profit company registered in Trinidad and Tobago that shares our commitment and promotes these global initiatives.

6. TQF has taken up the challenge put forward by Mr. Kofi Annan, seventh Secretary-General of the United Nations, to ensure that sustainable development becomes a reality for everyone worldwide. We are committed to implementing this framework to drive economic growth, promote social justice, and encourage environmental stewardship. The ESPY Technical Services Limited Charter has expressly adopted the Sustainable Development Goal (SDG) 3 targets, “Ensure healthy lives and promote well-being for all at all ages,” in executing its mandate.
7. ESPY Technical Services Limited intends that all workers be employed by TQF and reassigned to the specific company to promote the efficiency of our operations, as well as Goal 17, Partnership for the Goals. ESPY Technical Services Limited is currently undergoing a restructuring process wherein all employees will be hired directly under TQF and reassigned to ESPY Technical Services Limited as part of our bespoke business model to promote NGO capacity building, the Sustainable Development Goals, and the United Nations Global Agenda.
8. The Global Compact speaks to private sector partnership and commitment to the international standard set by the 2030 Agenda. This is our attempt to ensure its accelerated implementation, particularly within the Latin American and Caribbean (LAC) Region. TQF provides capacity building and business process outsourcing services to ensure that our internal policies and guidelines comply as far as possible with international standards regarding labour rights, anti-corruption, environmental sustainability, and human rights.
9. We have adopted TQF’s policy documents and commit to engaging TQF as our partner to monitor and evaluate our compliance with the standards above and recommend relevant methods of implementation in the future. Currently, TQF provides capacity building and business process outsourcing services for various companies. All contracts stemming from TQF are preloaded with a commitment to the UNGC as part of their terms of reference.
10. ESPY Technical Services Limited aims to partner with The Quantum Foundation in securing a partnership with the World Health Organisation to accelerate the implementation of SDG 3: Good Health and Well-Being.



11. ESPY Technical Services Limited firmly believes that protecting labour rights is a collective responsibility. We are committed to effecting positive change through all facets of our operations. By integrating sustainability into ESPY Technical Services Limited's core functions, we strive to contribute meaningfully to a healthier planet and a more sustainable future for all.

Applicability:

12. This policy applies to all departments and teams at ESPY Technical Services Limited that are involved in planning, executing, and evaluating actions and projects.

13. At ESPY Technical Services Limited, our commitment to the Labour Rights Policy underscores our dedication to achieving excellence in all facets of our operations. We understand that efficient action implementation and thorough evaluation are crucial to attaining our strategic goals and maintaining high standards of performance and accountability.

14. ESPY Technical Services Limited is dedicated to implementing the Global Compact and encouraging other private sector actors to do the same. We are committed to working against all forms of abuse against labour rights and decent work. We undertake to implement sufficient reporting mechanisms to ensure that whistle-blowers can effectively report on suspected and credible instances of abusive activities within the company and amongst external stakeholders.

15. We abide by all domestic legislation concerning the promotion of labour rights and decent work, respect for workers, non-discriminatory practices, and established international best practices governing this area insofar as possible. ESPY Technical Services Limited acknowledges the United Nations' fight against child labour and the strengthening of labour standards and implementing the [Global Compact Labour Principles](#) within our operations (Principles 3, 4, 5, and 6):

- i. *Businesses should uphold the freedom of association and effective recognition of the right to collective bargaining.*
- ii. *The elimination of all forms of forced and compulsory labour;*
- iii. *The effective abolition of child labour; and*
- iv. *The elimination of discrimination in respect of employment and occupation.*



16. We recognise the importance of providing safeguards to employees to encourage a zero-tolerance approach to discriminatory activities and hold United Nations guidelines on this thematic area insofar as practicable for a company of our size.

Objectives:

17. ESPY Technical Services Limited is committed to:

- i. Uphold all relevant labour standards, adhering to relevant International Labour Organisation standards insofar as practicable for an organisation of this size.
- ii. Protect employees against discrimination based on their affiliation with a trade union or similar labour group.
- iii. Ensuring a safe work environment that promotes all staff's physical, mental, and emotional well-being.
- iv. Providing access to relevant support resources whereby employees can access the necessary medical and psychological support to maintain their health and well-being.
- v. Abiding by the Equal Opportunity Act Chapter 22:03 and relevant international best practices to promote equality and diversity within the workplace.
- vi. Implement a transparent recruitment, selection, evaluation, and management program that upholds international best practices for an organisation of this size.
- vii. Treat all employees, independent contractors, consultants, and staff fairly, maintaining the dignity and respect of the individual.
- viii. Committing to Decent Work, living wages, sustainable procurement, and international best practices regarding health and safety practices insofar as they align with Trinidad and Tobago's domestic legislation.
- ix. Comply with our commitment to refrain from engaging any company that may actively or passively engage in the following:
 - a. Condoning forced labour or child labour
 - b. Restricting freedom of association and the individual's right to engage in the collective bargaining process
 - c. Promoting unsafe working environments
 - d. Restricting employee incident reporting mechanisms
 - e. Restricting freedom of expression
 - f. Restricting access to proper sanitation on the job site and potable water



Implementation:

18. ESPY Technical Services Limited has established a cross-functional committee to address our commitment to the UNGC and our corporate responsibility to labour protection. We have partnered with The Quantum Foundation to assess our compliance with company policy catered to the Principles of the Global Compact.

The Cross-Functional Committee on Labour, Principles 3, 4, 5, and 6 of the UNGC.

19. ESPY Technical Services Limited is a small to medium enterprise. Noting this reality and its effect on our organisational structure, we have taken additional steps to engage with and implement the Global Compact Labour Principles purposefully. One of these steps is implementing a Cross-Functional Committee on Labour Protection.

20. The Committee shall comprise a representative of Senior Management (CEO or someone with delegated authority), a representative of TQF who has been engaged as our partner overseeing our implementation of and compliance with internal policy and international best practices, and a selected staff representative who shall be responsible for communicating the committee's recommendations to staff and stakeholders.

21. Role and Function of the Cross-Functional Committee Members:

- i. Representative of Senior Management—Understand and approve the recommendations of TQF and ensure their implementation into company policy. Where divergent opinions occur, senior management ensures that said discrepancies are resolved and that the company can move forward with settled views on challenging issues. Senior management must identify priority areas for risk assessment activities and ensure that due diligence is performed at all times to identify and prevent or at least mitigate any potential negative impact on sustainability.
- ii. TQF- assesses the company's existing policies and ensures compliance. These policies must then be assessed against international best practices so that there is a constant process of monitoring and evaluation in the future so that progress is never



stagnated. TQF must then communicate its findings by reporting to senior management and frequently liaising with that arm of the committee to ensure that the partnership achieves its aim of promoting compliance with the UNGC. TQF must then recommend progressive action to ensure that the company direction aligns with the Ten Principles and evaluate the implementation of its recommendations annually. TQF shall also be responsible for conducting training sessions on company policies to assist with communicating and understanding company policy.

- iii. Staff Representative- is responsible for communicating the decisions of the Committee to staff and stakeholders. While not responsible for compliance, this role is essential to ensuring that the relevant policies are accurately communicated company-wide and understood. Should further questions or challenges arise, the staff representative must refer persons to TQF or directly to senior management to address any concerns effectively and efficiently. A code of confidentiality covers all referrals, and all staff and stakeholders must be assured that no adverse reaction will emanate from any action related to this policy.

Risk Assessment and Due Diligence

22. A clear and structured process guides ESPY Technical Services Limited's approach to risk assessment and due diligence reporting per this policy guideline.

Risk Assessment Guidance:

23. Identifying the Risk:

Safeguarding labour rights within the corporate space must begin with sufficient knowledge and training for staff. Therefore, our risk assessment guidance starts with ensuring that staff is periodically trained in this area by in-house experts on sustainable development. Our partner, The Quantum Foundation, has approved our training programme, and the training has been implemented in partnership with TQF. The following thematic areas have been identified:

- i. Legal risks
 - ii. Commercial and operational risks
 - iii. Reputational risks
24. ESPY Technical Services Limited is also committed to engaging third-party auditors to examine the company's sustainability practices and to assist in forecasting and



preparing budgetary documents for the following financial year. This mechanism provides another layer of risk assessment via a third-party partner, ensuring an independent evaluation of the Company across all material levels, yielding a robust risk assessment process.

Mitigating the Risk:

25. Due to our size as a Small to Medium Enterprise (SME), we have implemented several initiatives to ensure sufficient oversight of company activities:

- i. Monitoring serves as a fundamental element of our implementation strategy. ESPY Technical Services Limited utilises established performance metrics and conducts regular reviews to track progress, allowing us to address any challenges and maintain project momentum effectively. This continuous oversight ensures that our actions align with our objectives and that any deviations are promptly addressed. Our company is young and still streamlining our activities, having introduced our policy commitments on the Global Compact. The next step is monitoring our policy objectives while assessing this against international best practices.
- ii. There is increased managerial oversight when engaging new partners or third parties, coupled with tailored training for senior management in decision-making positions to continuously update their ability to identify, mitigate, and prevent risks attached to labour principles. We also require increased due diligence mechanisms when engaging suppliers or making significant investments. We review these internal mechanisms periodically through our partnership with TQF to ensure that our risk strategy to minimise our overall risk exposure can stand the test of the international system. Before a third party is engaged, the following is considered:
 - a. Legal status and type of organisation, as well as the jurisdiction of incorporation.
 - b. Assessment of ownership structure, including financial management and affiliated entities.
 - c. Determination of any actual or potential conflict of interest.
 - d. Business reputation of intended partner.
 - e. Business partner's internal sustainability programme



- f. Business partner's willingness to abide by our labour policy and commitment to the United Nations Global Compact.
 - g. Business partners programme for sustainable procurement
 - h. Business partner's commitment to Decent Work Principles and commitment to the protection of Labour Rights.
- i. Evaluation constitutes an essential component of our unwavering dedication to continual enhancement. ESPY Technical Services Limited meticulously evaluates the abovementioned against predetermined objectives and key performance indicators, as the United Nations Guiding Principles on Business and Human Rights suggests. In this regard, ESPY Technical Services Limited is committed to undertaking social impact assessments of our projects, which are vital. This data-centric approach empowers us to make well-informed decisions and refine our strategies to achieve even more superior outcomes in the future.
- ii. Transparency and accountability are fundamental principles of ESPY Technical Services Limited's policy. The Company is dedicated to providing our stakeholders with regular progress reports and comprehensive final evaluation reports. This ensures all parties know our achievements, obstacles, and upcoming initiatives. Embracing this practice of openness fosters trust and nurtures a culture of shared responsibility and accountability. All business partners, employees and associated third parties are also informed of our commitment to the United Nations Global Compact.
- iii. Due diligence is centred on our responsibility to cater to and protect human rights. At the same time, we continuously fight to address any identifiable risk associated with our business portfolio that can hamper or constrain the promotion of human rights. As a Small to Medium Enterprise, we commit to the following:
- a. Cultivate a business culture that promotes decent work, freedom of association and the effective recognition of the right to collective bargaining, labour protection and labour rights, non-discrimination, a safe and healthy working environment and working conditions. Communication is vital, and senior management has acknowledged the power of dialogue to



spread acceptance of this type of company culture. Any potential conflicts must be identified as soon as practicable and resolved accordingly.

- b. Focus on an action-oriented approach: Senior management has already partnered with TQF to ensure a pragmatic approach to training and development for its staff related to the implementation of company policy, bringing it to life at the most crucial resource level—human resources.
- c. Collaboration is critical: We encourage cross-sectorial dialogue towards progress. We applaud our staff, who can transfer knowledge across different working groups, corporate entities, and cultures to facilitate the dissemination of critical information regarding the UNGC initiative. In this regard, inter- and intra-company dialogue is encouraged.
- d. Building Trust: no company can progress independently in this globalised era. We encourage our staff to build long-term relationships with trusted partners with whom a relationship can be established. Doing business with like-minded corporate entities will ensure that the UNGC principles are disseminated effectively and that all parties understand and accept our internal standards relating to labour protection. This will eventually allow SMEs to engage in systemic issues, challenging progress on critical obstacles to promoting and protecting labour rights as human rights.
- e. Freedom to forge pathways to higher standards—while we never want to reinvent the wheel, we understand the importance of unlimited design. The potential for success is exponential, and harnessing growth is critical to revitalising the industry. When business takes a stand for human rights, it is noticed. Implementing inter-company policy via continuous engagement, monitoring, and evaluation at all levels of company governance is essential to its success.

26. ESPY Technical Services Limited requires all staff and all our internal and external stakeholders, partners and clients to implement and abide by the preceding.

27. ESPY Technical Services Limited commits to ensuring this policy is communicated to all parties and understood, providing ample opportunity for clarification.



Reporting

28. ESPY Technical Services Limited acknowledges the inalienable link between human rights and labour rights. We are committed to avoiding causing or contributing to gross violations of human rights, including any adverse impact on labour rights through any activity attributable to us or our business partners. Where these instances may occur, we commit to mitigating adverse effects that can be directly or indirectly linked to our operations or that of our business partners. This shall be progressively monitored through our robust reporting procedure so that we can continuously evaluate the impact of our activities on human rights.
29. ESPY Technical Services Limited is committed to the implementation of Reporting Practices that are:
 1. Confidential
 2. Free from retaliatory action
 3. To an independent auditor and senior management
 4. Protects the whistleblower
30. Employees may report actual or suspected labour rights breaches to senior management and TQF as an external party in writing. Reports must be made in good faith. Reports will be treated with the utmost confidentiality, and the reporter's identity will be kept confidential. Reports found to be credible upon initial investigation shall result in concrete action by Senior Management and or a representative of TQF as an external partner to mitigate any human rights impact attributable to the company. All claims will be evaluated by the Cross-Functional Committee, whose members shall be notified and committed to maintaining the absolute confidentiality of this process. The Whistleblower (refer to Whistleblower Policy attached to Anti-Corruption Policy) shall also receive an incentive to be determined by the Cross-Functional Committee for engaging in this process.
31. Should an employee feel that they have been victimised, we encourage that employee to pursue all action against the company, including pursuing relevant legal avenues available within the jurisdiction of Trinidad and Tobago.

Tracking System:

32. ESPY Technical Services Limited has implemented a tracking system for reporting actual or suspected cases of human rights abuses to Senior Management. The company



has established a list of indicators by which our business and business relationships may be assessed. These metrics allow us to effectively monitor and evaluate our practices and that of our partners. Quantitative and qualitative metrics are used to determine the company's business environment at both a micro-economic and macro-economic level. The state's human rights metrics are also considered via an analysis of its process indicators, as political commitment will impact the private sector's commitment to this Principle of the Global Compact.

Reporting Standards:

33. We encourage all stakeholders to report actual or suspected breaches of human rights to Senior Management so that remedial action can be taken and instances of collaboration can be effectively mitigated. The following reporting standards must be observed:
 - i. Identify Human rights abuse in writing. Where the abuse occurs with a third-party business partner, that partner and the specific issue must be identified.
 - ii. Instances of company complicity must be identified clearly.
 - iii. Identify the actual or suspected affected groups so the company may investigate appropriately with consultation from all stakeholders and affected parties.
34. If the offending party is a business partner providing a crucial service to the company and the abuse is proven, the company reserves the right to end the relationship if the risk cannot be mitigated.

Policy Review:

35. This policy will be reviewed annually or as needed to ensure its continued relevance and effectiveness. Updates and revisions will be made as necessary to address emerging environmental issues and advancements in sustainability practices.

Approval and Implementation:

36. This Labour Rights policy has been approved by Criston J. Williams, CEO ESPY Technical Services Limited, effective as of August 2024. All employees are expected to adhere to the principles and practices outlined in this policy.



Signed,

Signed,

 Recoverable Signature

X Criston J. Williams

Criston J. Williams

CEO, Quantum Medicinal Research and Developm...

Signed by: b5084eed-1b0a-4764-8452-85e6c4ffeaaf



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MONITORING AND EVALUATION PROCEDURE

1. ESPY Technical Services Limited falls within the Small to Medium Enterprises category. Due to the company's size, resources are finite and are distributed stringently across priority areas. Due to the prioritisation of the United Nations Global Compact Principles, we have dedicated sufficient funding to the monitoring and evaluation of our activities insofar as it relates to our obligations under the United Nations Global Compact. We focus on the following:
 - i. **Monitoring** serves as a fundamental element of our implementation strategy. ESPY Technical Services Limited utilises established performance metrics and conducts regular reviews to track progress, allowing us to address any challenges and maintain project momentum effectively. This continuous oversight ensures that our actions align with our objectives and that any deviations are promptly addressed. Our company is young and still streamlining our activities, having introduced our policy commitments on the Global Compact. The next step is to continue monitoring our policy objectives while assessing this against international best practice.
 - ii. There is increased managerial **oversight** when engaging new partners or third parties, coupled with tailored training for senior management in decision-making positions to continuously update their ability to identify, mitigate and prevent risks attached to labour rights principles. We also require increased due diligence mechanisms when engaging suppliers or making any significant investment. We review these internal mechanisms periodically through our partnership with TQF to ensure that our corporate strategy to assess our overall risk exposure can stand the test of the international system. Before a third party is engaged, the following is considered:
 - a. Legal status and type of organisation, jurisdiction of incorporation.
 - b. Assessment of ownership structure, including financial management and affiliated entities.
 - c. Determination of any actual or potential conflict of interest.
 - d. Business reputation of intended partner.
 - e. Business partner's internal corporate social responsibility programme.



- f. Business partner’s willingness to abide by our labour rights policy and commitment to the United Nations Global Compact.
 - g. Business partner’s reputation as it relates to its human rights record.
 - iii. **Evaluation** constitutes an essential component of our unwavering dedication to continual enhancement. ESPY Technical Services Limited meticulously evaluates the abovementioned against predetermined objectives and key performance indicators, as required by the United Nations Office of the High Commissioner on Human Rights publication *Human Rights Indicators: A Guide to Measurement and Implementation (2012)*. This data-centric approach empowers us to make well-informed decisions and refine our strategies to achieve even more superior outcomes in the future. Evaluation is continuous and undertaken by our partner, The Quantum Foundation.
 - iv. **Transparency and accountability** are fundamental principles of ESPY Technical Services Limited’s policy. The Company is dedicated to providing our stakeholders with regular progress reports and comprehensive final evaluation reports. This ensures that all involved parties are informed of our achievements, obstacles, and upcoming initiatives. Embracing this practice of openness fosters trust and nurtures a culture of shared responsibility and accountability. All business partners, employees and associated third parties are also informed of our commitment to the United Nations Global Compact.
 - v. **Due diligence** is centred on our responsibility to cater for and protect human rights while we continuously fight to address any identifiable risk associated with our business portfolio that can hamper or constrain our commitment to protecting labour rights. As a Small to Medium Enterprise, we commit to the following:
 - a. Cultivating a business culture that promotes the prevention of corruption and remediation of actual or suspected labour rights violations. Communication is key and senior management has acknowledged the power of dialogue to spread acceptance of this type of company culture. Any potential conflicts must be identified as soon as practicable and resolved accordingly.
 - b. Focusing on an action-oriented approach: Senior management has already partnered with TQF to ensure a pragmatic approach to training and development



for its staff related to the implementation of company policy, bringing it to life at the most important resource level—human resources.

- c. Collaboration is key: we encourage cross-sectorial dialogue towards progress. We applaud our staff, who can transfer knowledge across different working groups, corporate entities, and cultures to facilitate the dissemination of critical information regarding the UNGC initiative. Inter and intra-company dialogue, in this regard, is encouraged.
- d. Building Trust: no company can progress independently in this globalised era. We encourage our staff to build long-term relationships with trusted partners with whom a relationship can be established. Doing business with like-minded corporate entities will ensure that the UNGC principles are disseminated effectively and that all parties understand and accept our internal standards as they relate to the prevention of corruption. This will eventually allow SMEs to reach a place where there is the corporate will to engage on systemic issues challenging progress on critical obstacles to promoting and protecting labour rights as human rights.
- e. Freedom to forge pathways to higher standards- while we never want to reinvent the wheel, we understand the importance of unlimited design. The potential is exponential for success, and harnessing growth is critical to revitalising the industry. When business takes a stand for labour rights and ethical business practices, it is noticed. Implementing inter-company policy via a process of continuous engagement, monitoring, and evaluation at all levels of company governance is essential to its success.

Data Analytics and Peer Review

2. ESPY Technical Services Limited also relies on quantitative data sets provided by its partner Quantum Legal, which drafts, reviews, and approves all company contract documents.
3. ESPY Technical Services Limited promotes a think-tank approach to human rights where like-minded business partners, external auditors and international watchdogs are invited to review our internal human rights policies. This is with the aim of:
 1. Encouraging discussion on the business impact on human rights through stakeholder participation.



2. Collaborating on the drafting of comprehensive business ethical standards that place human rights at the centre of corporate governance.
3. Introducing public-private partnerships in implementing human rights conventions in business standards domestically.

Tracking Progress

3. Mitigation of labour rights impacts requires ongoing analysis to assess the effectiveness of the following activities:
 - i. Allocation of resources.
 - ii. Training sessions.
 - iii. Basic outputs.
 - iv. Collaboration and Collective Action
4. Data is collected via qualitative and quantitative means by measuring the following indicators:
 - i. Knowledge and understanding of collective bargaining agreements.
 - ii. Women in managerial positions.
 - iii. Pay equity.
 - iv. Equal opportunity.
 - v. Compliance of third parties with sustainable practices.

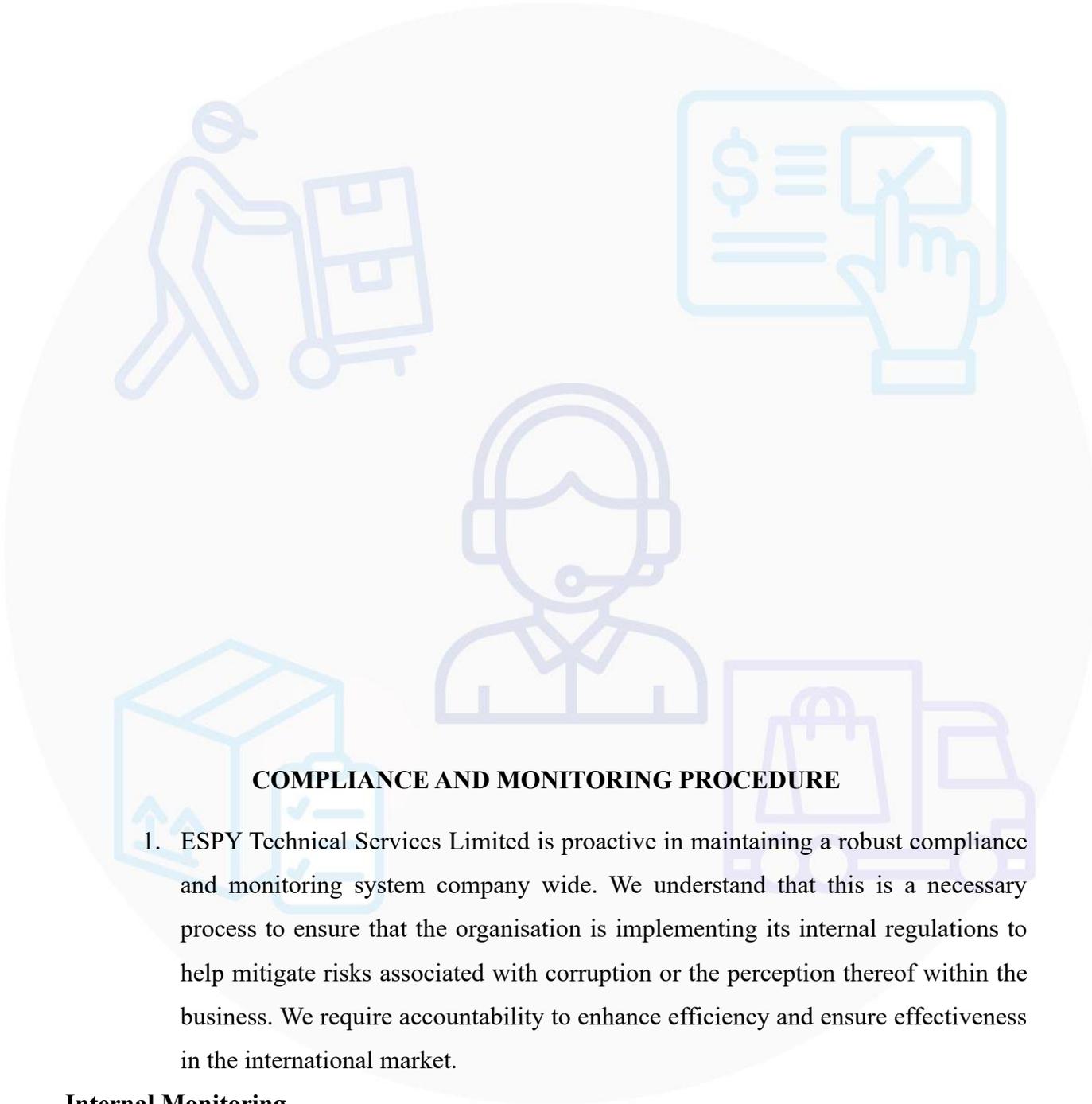
RESPONSIBILITY AND POLICY REVIEW

5. The Quantum Foundation's General Counsel is responsible for monitoring the implementation of and reviewing this policy under the oversight of senior management. This Policy is reviewed annually or sooner if required.

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Criston J. Williams
CEO, Quantum Medicinal Research and Develop...





COMPLIANCE AND MONITORING PROCEDURE

1. ESPY Technical Services Limited is proactive in maintaining a robust compliance and monitoring system company wide. We understand that this is a necessary process to ensure that the organisation is implementing its internal regulations to help mitigate risks associated with corruption or the perception thereof within the business. We require accountability to enhance efficiency and ensure effectiveness in the international market.

Internal Monitoring

2. Internal Monitoring is set out in our Labour Rights Policy. ESPY Technical Services Limited has implemented a rigorous risk assessment, mitigation, and due diligence process as identified within the Labour Rights Policy. The Quantum Foundation



acts as our partner to monitor the implementation of the same and evaluate its effectiveness in the business environment. A vigorous data collection process shall be undertaken in the form of:

- i. Questionnaires were disseminated to all stakeholders of the company to measure perceptions of the anti-corruption policy.
 - ii. Qualitative analysis of international best practice.
 - iii. Peer review and comparison of similar businesses in the market.
3. Additionally, we engage in self-monitoring to ensure that required processes are implemented company-wide. All employees are expected to report any instances of actual or suspected labour rights abuses following the reporting procedure identified in our Labour Rights Policy. Employees must complete all labour rights training sessions.

External Audits

4. ESPY Technical Services Limited is committed to transparency. We are committed to ensuring that our operations are transparent and mitigating any risk of complicit activity that may result in an adverse impact on our human rights record.
5. Similarly, ESPY Technical Services Limited shall also engage an external auditor to review its Programmes and Policies after the completion of a three-year cycle, or sooner if necessary. A three-year cycle has been selected considering the company's nature and the financial cost attached to this exercise. This review shows our commitment to ensuring the practical implementation and evaluation of our labour rights policy to observe our commitment to the United Nations Global Compact.

Assessment of Stakeholders

6. Stakeholders shall include the following: employees, business partners, affiliated entities and service providers. Stakeholders shall be assessed against the following criteria:
 - i. Actual or Perceived labour rights abuses: number of reports made against stakeholders.
 - ii. Result of investigation.
 - iii. Impact on stakeholder engagement.
 - iv. Policy compliance
 - v. Risk associated with continuing engagement of stakeholders.

Peer-Review and Analysis



7. Given the recent COVID-19 pandemic, the healthcare and medical research industry is quite robust in Trinidad and Tobago and the region. However, the Global Compact and its resources are a niche sector of this industry. As such, ESPY Technical Services Limited will promote its competitive advantage over other companies via a robust peer review and comparison with like-minded ventures within the industry. Stakeholder engagement is critical and private sector think-tanks are essential to showcasing private sector influence over national policy. The private sector's will to demand compliance with international standards will send a strong message to national entities that implementing ratified human rights conventions is non-negotiable.

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Criston J. Williams
CEO, Quantum Medicinal Research and Develop...



LABOUR RIGHTS TRAINING AND CERTIFICATION PROCESS

1. Given the nature of the field and the need for ESPY Technical Services Limited to engage with the public sector, we require that all Staff undergo basic human training, facilitated both internally and externally.
2. Internal training shall be for all staff, continuous and implemented by our partner, The Quantum Foundation. Senior Management will be required to complete external training sessions semi-annually with a selected service provider, a cost that the company is fully committed to covering.
3. Training may be in-person or online. Employees shall be allotted the required time to complete said training. As such, employees must inform the company of the expected dates for training at least one month in advance so that appropriate measures can be put in place to account for the absence of the employee.
4. The Company shall keep a record of all training activities, dates, participants and service providers under its retention policy.
5. The Quantum Foundation is responsible for designing and implementing training modules periodically with staff to ensure that employees are always informed of the latest measures to protect human rights at the state, international and company levels.
6. The special focus shall be on informing participants of:
 - i. Domestic legislation and judicial guidance on labour rights protections available in Trinidad and Tobago;
 - ii. Relevant international conventions guiding labour rights with a focus on standards set by the International Labour Organisation;
 - iii. The company's internal policies on how to detect, report and prevent labour rights abuses and complicit activities;



- iv. Guidelines on the protection of identified vulnerable groups. These training sessions should be specific to one identified grouping at a time.
7. External service providers shall be selected via a competitive process. The rationale and method of selection shall be recorded by the company as part of its records.
8. External service providers must abide by the United Nations Global Compact and be willing to accept the company's policy on Labour Rights.

Domestic legislation and judicial guidance on labour rights protections available in Trinidad and Tobago

9. Topics should include the following:
 - i. Identification of applicable laws addressing labour rights concerns within Trinidad and Tobago.
 - ii. Information on how laws and policies influence the private sector's engagement with this thematic area.
 - iii. Information on the Collective Bargaining movement and trade unionism in Trinidad and Tobago.
 - iv. Identification of how laws are incorporated into the wider corporate policy.

Relevant international conventions guiding human rights

10. The focus shall be placed on the United Nations Treaties and Conventions governing Labour and Human Rights, such as:
 - i. The International Convention on the Elimination of All Forms of Racial Discrimination.
 - ii. The Convention on the Elimination of All Forms of Discrimination against Women.
 - iii. The Convention on the Rights of the Child.
 - iv. The International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families.
 - v. The Convention on the Rights of Persons with Disabilities.
 - vi. The United Nations Declaration on the Rights of Indigenous Peoples.
 - vii. The Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities.
 - viii. International Labour Organisation Standards:
 - a. C138 Minimum Age Convention, 1973 (No. 138)
 - b. C029 Forced Labour Convention, 1930 (No. 29)



- c. C182 Worst Forms of Child Labour Convention, 1999 (No. 182)
- d. C100 Equal Remuneration Convention, 1951 (No. 100)
- e. C111 Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

The company's internal policies on how to detect, report and prevent human rights abuses and complicit activities:

11. Focus should be placed on examining the Corporate Social Responsibility Policy, including opportunities for stakeholders to amend or improve it during training sessions. Applicable amendments should be incorporated into the existing policy during the policy's annual review.
12. Special focus will also be placed on steps to address human trafficking and the trafficking of persons for the purpose of forced labour.

Guidelines on the protection of identified vulnerable groups. These training sessions should be specific to one identified grouping at a time.

13. Identified Groups include the following:
 - Refugees and Migrants
 - Indigenous Peoples
 - LGBTQI+ persons
 - Gender Equality and Women's Rights

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Criston J Williams
Director-Quantum Medicinal Research & Dev.

