

A photograph of four men, likely Accenti employees, standing in a row at a construction site. They are all wearing white hard hats with the "accenti" logo, dark safety glasses, and orange high-visibility safety vests over dark blue polo shirts. The vests also feature the "accenti" logo. They are standing in front of a large, open steel framework of a building under construction. The background shows some greenery and a clear sky. The overall image has a dark, semi-transparent overlay.

HUMAN RIGHTS AND FAIR LABOUR

Human Rights and Anti-Trafficking Policy

Fair treatment, free choice of employment and decent working conditions for every worker in our operations and supply chain.

Date 22 October 2026
Reference AC-HR-POL-002 · Revision 00
To All employees, temporary personnel, contractors and subcontractors working for or on behalf of Accenti LLC

Issue of the Human Rights and Anti-Trafficking Policy, AC-HR-POL-002, Revision 00

Dear colleagues,

I am pleased to issue the Accenti Human Rights and Anti-Trafficking Policy, effective 22 October 2026. It applies to every person we employ, every labour agency we use and every supplier and subcontractor who works for us.

Many of our people are recruited locally and through agencies, and some travel far from home to work on our sites. They are entitled to choose freely to work for us, to be paid fairly and on time, and to be housed and treated with dignity.

Human Resources will check our labour agencies and subcontractors against this policy, and site managers are asked to make sure accommodation and working hours meet the standards it sets.

Please read this policy and report any sign of forced labour, trafficking or abuse immediately. Compliance is mandatory.

Yours sincerely,



Ali Ahmed Dhadhaow
Chief Executive Officer
Accenti LLC



ADDRESS

Accenti Compound, Marina Hub
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T +252 615 540 606

WEB

www.accenti.com
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DEFENSE INFRASTRUCTURE

MISSION SUPPORT

Human Rights and Anti-Trafficking Policy

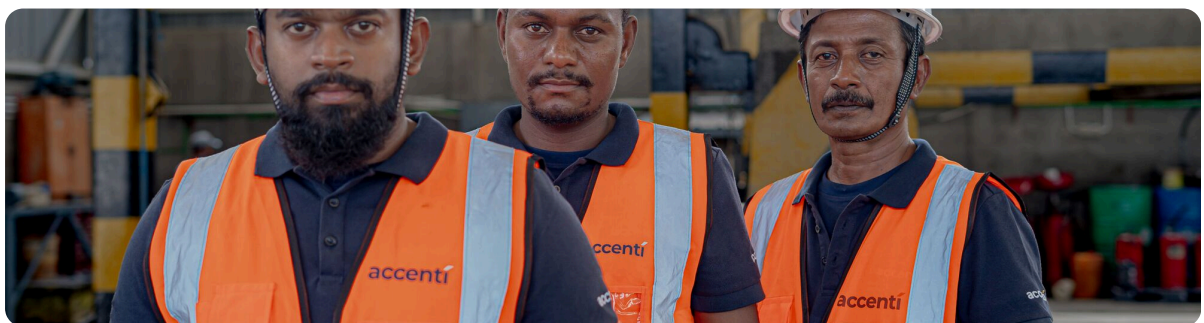
DOCUMENT	REVISION	EFFECTIVE	STATUS
AC-HR-POL-002	00	22 Oct 2026	Approved / Issued
APPROVAL AUTHORITY		POLICY OWNER	
Accenti LLC Management		Human Resources Department	
APPROVED BY		APPROVED ON	NEXT REVIEW
Ali Ahmed Dhadhaow, Chief Executive Officer		22 Oct 2026	22 Oct 2027

Controlled document. Approval is evidenced by the signed and sealed cover letter. The current revision is held by Human Resources; printed copies are uncontrolled.

Accenti LLC respects internationally recognised human rights and prohibits forced labour, human trafficking and modern slavery in its activities and supply chain.

1 Application

This policy applies to all Accenti employees and to labour agencies, subcontractors and suppliers. It works alongside the Anti-Child Labour Policy (AC-HR-POL-001) and the Equal Opportunity and Anti-Harassment Policy (AC-HR-POL-004).



— Every worker recruited freely, paid on time and able to leave with notice.

2 Mandatory requirements

- 2.1 Freely chosen employment. Work shall be voluntary. Forced, bonded, prison or trafficked labour is prohibited, and workers may resign with reasonable notice.

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- 2.2 Documents and fees. Identity documents and passports shall never be retained. No worker shall pay recruitment fees or related costs to obtain work.
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- 2.3 Written terms. Every worker shall receive written terms, in a language they understand, before starting work.
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- 2.4 Wages and hours. Wages shall be at least the legal minimum, paid in full and on time, with no unlawful deductions. Working hours and rest shall comply with law and be recorded.
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- 2.5 Accommodation and welfare. Worker accommodation shall be safe, clean, adequately ventilated and give workers freedom of movement.
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- 2.6 Grievances. Workers shall have access to a confidential grievance channel, without fear of retaliation.
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- 2.7 Supply chain. Labour agencies and higher-risk suppliers shall be assessed before engagement and monitored. Contracts shall include these requirements and a right to audit.
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3 Responsibilities and enforcement

Human Resources shall control recruitment, terms and agency checks. Site managers shall apply the accommodation, hours and welfare requirements. Procurement shall carry these terms into supplier contracts. Breaches shall result in disciplinary action or termination of the supplier relationship, and cases of trafficking shall be reported to the competent authorities.

4 Reference framework

- 01 The Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.
- 02 ILO Conventions No. 29 and 105 on forced labour.
- 03 Applicable labour and anti-trafficking law in Somalia, the United Arab Emirates and every country where Accenti works.

Every worker free to choose, fairly paid and treated with dignity.

Questions about this policy?

Human rights concerns go to Human Resources or to the contacts below.
Reports are handled in confidence.

Operations — Somalia

Accenti Compound, Marina Hub
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Mogadishu 0100, Banadir, Somalia

Headquarters

United Arab Emirates

Contact

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W www.accenti.com

Policy owner

Human Resources Department
AC-HR-POL-002 · Revision 00

■ On every site

Free to leave

No worker's passport or ID is held, no worker pays to get a job, and every worker can resign with notice. Report anything that suggests otherwise.

info@accenti.com →





Zero harm to people, property and the environment.

Construction · Facility Management · Logistics
Asset Management & Fleet · Workforce Solutions