



HUMAN RIGHTS

Strategic Significance

With the emergence of the UN Guiding Principles for Business and Human Rights came a greater appreciation of the extent of control and influence that companies can have on ensuring the respect and promotion of human rights through its activities, be it directly or indirectly.

Orocobre operates in a region populated primarily by indigenous communities, with little access to essential services, and challenging environmental conditions. The human rights risks and opportunities in the region are significant and the Company acknowledges the importance of its role in ensuring these are managed effectively.

Orocobre is also aware of the need for its investors and customers to have assurance that their supply chain is socially and environmentally responsible, and this means ensuring the Company remains vigilant and responsive to human rights risks not only in its operations, but also along its value chain.

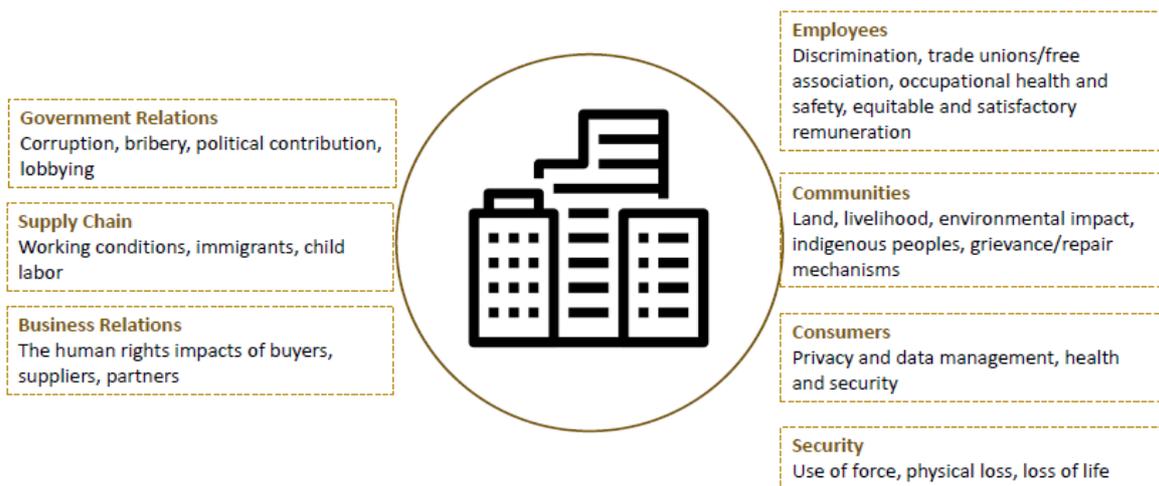
Impact Boundary

This management approach disclosure refers exclusively to Sales de Jujuy S.A. and its activities.

The Company considers Human Rights impacts within its operations and along its value chain.

Orocobre acknowledges that while it may not be directly responsible for human rights impacts, the Company may be complicit by association and as such it is mindful of the need to review all business relationships and promote awareness among its business partners.

The Company also understands that human rights impacts can occur in different roles and departments and therefore management of human rights issues requires a holistic approach.



Management Approach

Policy

The following policies outline Orocobre's commitment to human rights:

- [Human Rights Policy](#)
- [Sustainable Development Policy](#)
- [Community Policy](#)
- [Landholder Engagement Policy](#)
- [Code of Conduct](#)

The Company's commitment to the UN Sustainable Development Goals supports its broader commitment to human rights, with over 90 percent of the SDG targets relating directly to international human rights and labour standards.

Management Systems

Orocobre's approach to Human Rights management is in its early stages.

The Company's first step in establishing its management approach was to develop a robust due diligence process.

The human rights due diligence process was divided into two stages to provide breadth and depth of insight:

1. **Assessment of Contextual Issues:** evaluating the overarching human rights issues of relevance based on Orocobre's industry, operations, location and supply chain.
2. **Identification of Salient Issues:** evaluating the salient human rights issues based on more detailed evaluation of risks and impacts through on-site assessment and extensive stakeholder engagement.

The contextual issues profile emerging from Stage 1 will provide insight into areas requiring greater management focus, while the human rights issues register generated in Stage 2 will provide a robust control framework to ensure salient issues are being effectively managed.

Monitoring and Reporting

Following the initial assessment process, facilitated by an expert business and human rights consultancy, salient human rights issues will be evaluated and reviewed annually.

External reviews will be conducted regularly to ensure objective re-evaluation of the issues identified.

Responsibility

At a group level, responsibility for Human Rights management resides with the Chief Sustainability Officer.

Equally, every member of Orocobre's Executive team is responsible for protecting and promoting the respect of human rights in their respective areas of the business.

Accountability

Orocobre's Board and Executive are accountable for any human rights related incidents occurring as a result of the Company's activities

FY19 Update

In FY19, an assessment of contextual human rights issues was conducted across Orocobre’s assets and activities.

The assessment was externally conducted as the first stage of a two-part due diligence process and involved desktop analysis of internal and external source documentation as well as a series of internal stakeholder interviews with specific members of Orocobre’s executive and operational management teams.

Issues were analyzed and prioritized based on the severity of the potential impact on the humans affected, and relevance of the issue for the company.

The table below indicates the contextual human rights issues that emerged as having greatest potential impact on people and the greatest relevance for Orocobre given the nature of its operations and the jurisdictions in which it operates.

Category	Issue	SIGNIFICANCE		
		High	Medium	Low
Labour Rights	Health and Safety			
	Gender based discrimination			
	Harassment			
	Freedom of association			
	Access to employment opportunities			
Supply Chain	Decent working conditions in global supply chain			
	Decent working conditions in local supply chain			
Environmental Impact	Access to water			
	Public health and environmental impact			
Indigenous Peoples	Free, Prior and Informed Consent			
	Social and cultural identify, customs and traditions			
Land	Right to livelihood and access to natural resources			
	Ownership and access to land use			
Cumulative Impacts	Access to water			
	Right to an adequate standard of living			
Access to Remedy	Access to remedy; effective grievance mechanisms			
Security	Life, Freedom and security; Opinion and expression			
Bribery and Corruption	Decent working conditions; Adequate standard of living			

The assessment also identified the following three areas as opportunities to promote access to human rights, acknowledging that Orocobre already demonstrates actions and initiatives in each of these areas.

Community Development: Including inclusive socio-economic development; access to basic services such as energy, education and health; participatory methodologies and inclusion of vulnerable populations; partnership with the government to avoid replacing the role of the state.

Local Economic Empowerment: Promote local employment, both direct and indirect, through business management, entrepreneurship training and capacity building programs. Adapt to the opportunities that arise based on local traditions and culture.

Natural Resource Governance: support efforts for the government and local communities to exert greater control over their natural resources and its revenues, be it through international initiatives like the EITI or local programs.

In FY20 Orocobre will delve in greater detail into the actual risks and impacts based on direct site-based engagement and extensive stakeholder engagement to define a list of the Company's salient human rights issues.

Of the contextual issues defined as high significance, it is worth noting that the Company already has defined actions in place to:

- Improve the **Health and Safety** performance of the organization, through the Dupont safety culture change program and the implementation of the Intalex health and safety management system.
- Investigate the occurrence and the nature of potential **harassment** within the work environment.
- Promote greater control over **local supply chain** performance and working conditions through implementation of a supplier management system which notifies the Company immediately of discrepancies in supplier labour practices, enabling immediate intervention and control.
- Enhance community **access to water** – which is limited due to poor water quality, limited infrastructure and harsh seasonal variations – through collaborative projects with government and civil society.
- Review the effectiveness of internal grievance mechanisms and **access to remedy** for key stakeholder groups, including communities, employees, and the contractor workforce.

Orocobre will continue to liaise with key stakeholders on these issues, and the other contextual issues identified, over the coming year.

Orocobre is working to align its human rights disclosures with the Human Rights Reporting Framework. The Company appreciates that it will take time to achieve full alignment, but it will evaluate its improvement each year against the following Human Rights Reporting index.

Human Rights Reporting Index

Core Disclosure Requirement Met	
Core Disclosure Requirement Not Met	

A. Governance of Respect for Human Rights	
POLICY COMMITMENT	
A.1. What does the Company say publicly about its commitment to respect human rights?	
A.1.1. How has the public commitment been developed?	
A.1.2. Whose human rights does the public commitment address?	
A.1.3. How is the public commitment disseminated?	
EMBEDDING RESPECT FOR HUMAN RIGHTS	
A.2. How does the Company demonstrate the importance it attaches to the implementation of its human rights commitment?	
A.2.1. How is day-to-day responsibility for human rights performance organized within the Company, and why?	
A.2.2. What kinds of human rights issues are discussed by senior management and by the Board, and why?	
A.2.3. How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions?	
A.2.4. How does the company make clear in its business relationships the importance it places on respect for human rights	
A.2.5. What lessons has the Company learned during the reporting period about achieving respect for human rights, and what has changed as a result?	
B. Defining the Focus of Reporting	
B.1. Statement of Salient Issues: State the salient human rights issues associated with the Company's activities and business relationships during the reporting period.	
B.2. Determination of salient issues: Describe how the salient human rights issues were determined, including any input from stakeholders.	
B.3. Choice of focal geographies: If reporting on the salient human rights issues focuses on particular geographies, explain how that choice was made	
B.4. Additional severe impacts: Identify any severe impacts on human rights that occurred or were still being addressed during the reporting period, but which fall outside of the salient human rights issues, and explain how they have been addressed.	
C. Management of Salient Human Rights Issues	
SPECIFIC POLICIES	
C.1. Does the Company have any specific policies that address its salient human rights issues and, if so, what are they?	
C.1.1. How does the Company make clear the relevance and significance of such policies to those who need to implement them?	
STAKEHOLDER ENGAGEMENT	
C.2. What is the Company's approach to engagement with stakeholders in relation to each salient human rights issue?	
C.2.1. How does the Company identify which stakeholders to engage with in relation to each salient issue, and when and how to do so?	
C.2.2. During the reporting period, which stakeholder has the Company engaged with regarding each salient issue, and why?	
C.2.3. During the reporting period, how have the views of stakeholders influenced the Company's understanding of each salient issue and its approach to addressing it?	
ASSESSING IMPACTS	
C.3. How does the Company identify any changes in the nature of each salient human rights issue over time?	
C.3.1. During the reporting period, were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they?	
C.3.2. During the reporting period, did any severe impacts occur that were related to a salient issue and, if so, what were they?	

INTEGRATING FINDINGS AND TAKING ACTION	
C.4. How does the Company integrate its findings about each salient human rights issue into its decision-making processes and actions	
C.4.1. How are these parts of the Company whose decisions and actions can affect the management of salient issues, involved in finding and implementing solutions?	
C.4.2. When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?	
C.4.3. During the reporting period, what action has the Company taken to prevent or mitigate potential impacts related to each salient issue?	
TRACKING PERFORMANCE	
C.5. How does the Company know if its efforts to address each salient human rights issue are effective in practice?	
C.5.1. What specific examples from the reporting period illustrate whether each salient issue is being managed effectively?	
REMEDIATION	
C.6. How does the company enable effective remedy if people are harmed by its actions or decisions in relation to a salient human rights issue?	
C.6.1. Through what means can the Company receive complaints or concerns related to each salient issue?	
C.6.2. How does the Company know if people feel able and empowered to raise complaints or concerns?	
C.6.3. How does the Company process complaints and assess the effectiveness of outcomes?	
C.6.4. During the reporting period, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the Company learned?	
C.6.5. During the reporting period, did the Company provide or enable remedy for any actual impacts related to a salient issue and, if so, what are typical or significant examples?	

NB: Given that Orocobre has not yet defined its Salient Human Rights Issues, the Company acknowledges that it cannot fully align with the core disclosures from Sections B and C of the Reporting Framework. In FY20, the Company will disclose in alignment with the Reporting Framework’s minimum requirement (i.e. 2 substantive responses in Section A; 4 information requirements in Section B; and 6 substantive responses in Section C)