



Midal Cables Human
Rights Training Guide/
Handbook

Standard Document

Midal Cables Human Rights Training Guide/ Handbook

2025

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PURPOSE

At MIDAL CABLES B.S.C. (C) (“Midal Cables” or “Company”), we are committed to upholding the highest standards of human resources practices and ensuring the protection of labor rights across our organization. This Human Rights Policy outlines our commitment to providing a fair, safe, and inclusive workplace for all employees. This policy applies to all employees, contractors, and suppliers associated with Midal Cables.

What Are Human Rights?

Human rights are the basic rights and freedoms that belong to everyone, regardless of nationality, race, gender, religion, or background. In the workplace, these ensure all employees are treated fairly, safely, and with dignity.

Section 1: Introduction to Human Rights at Work

1.1 Objective:

This training pack and handbook has been developed as an extension of the existing Company Human Rights Policy (MCL-POL-ESG-07). It serves to provide clear guidance and raise awareness among employees, contractors, and management on fundamental human rights principles, ensuring these values are upheld and integrated across all Midal Cables operations both locally and globally.

1.2 Scope:

Applicable to all Midal Cables employees (full-time, contractual, temporary), subsidiaries, suppliers, and partners.

1.3 Why This Training?

- To prevent violations (e.g., child labor, discrimination)
- To improve employee well-being and productivity
- To comply with Bahrain labor law and international standards (ILO, UNGP)



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Section 2: Core Human Rights Commitments at Midal Cables

2.1 Non-Discrimination & Equal Opportunity

Description:

We promote a workplace where decisions are based on merit and qualifications, not on personal traits like race, gender, religion, or age.

We prohibit discrimination on any grounds, including Race, nationality, gender, age, Religion, disability, sexual orientation, political opinion, Marital status, pregnancy, or family responsibility.

Examples of Compliance:

- Provide equal access to training, pay, and benefits
- Hire and promote based on merit

Prohibited Behavior:

- Discriminatory comments or jokes
- Favoritism based on nationality or gender

2.2 No Child Labor or Forced Labor

Child Labor Explanation:

- Minimum working age is 18 at Midal
- No hazardous or night work for youth (16 up to 18 years, in educational/vocational training related to internship and cooperative training only)

Forced Labor Explanation:

- No confiscation of passports or IDs.
- All work must be voluntary, with freedom to resign.
- No recruitment through threats or loans.
- No salary deductions or threats to restrict workers' freedom.
- Contracts must be voluntary and understood by the employee.

What to Avoid:

- Using labor agencies that charge illegal fees
- Retaining documents of migrant workers

More details of the company related to Slavery & Human Trafficking System controlled document MCL-POL-SHT is available on the company website.



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2.3 Freedom of Association/ Trade Union & Collective Bargaining

Explanation:

Employees have the right to join labor unions or workers' committees, and to negotiate working conditions collectively.

Rights Include:

- Forming or joining a trade union.
- Choosing representatives.
- Participating in union activities without fear (where legally permitted).

Employer Role:

- Respect employees' rights.
- Avoid retaliation or interference or obstruction of lawful labor organization.
- Engage in good-faith dialogue.

2.4 Health & Safety Work Environment

Explanation:

Every employee has the right to a safe and hygienic working environment. More details about the company Social Responsibility Policy and environment Health & Safety is made available on the company website

<https://www.midalcable.com/storage/homepage/csr/signed-mcl-social-responsibility-policy-disclosure.pdf>

Examples:

- Zero tolerance for unsafe practices.
- PPE provided and used correctly.
- Fire drills and emergency training.
- Pregnant workers not exposed to harmful tasks.

Key Principles:

- Prevention first: Accidents must be avoided, not just managed
- Health checks when operating in high-risk areas
- Mental health support, especially after injury or trauma



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Specific practices:

- Clean drinking water, hygienic facilities
- Emergency care and first-aid readiness
- Job specific protective gear and safety induction for all workers
- Applicable adjustments for pregnant or breastfeeding employees

2.5 Working Conditions and Fair Compensation

Explanation:

Work-life balance is essential to prevent burnout, reduce accidents, and retain staff.

Wages and Hours

- All wages are paid in line with Bahrain labor law.
- Overtime is voluntary and compensated at legal premium rates.
- Clear pay slips and wage transparency.

Working Hours and Breaks

- Regular hours: 8 Hours/day - Max 11 hours/day (per Bahrain Law 36/2012)
- Breaks: Minimum 60 minutes after 6 hours/ Praying Time/ Frequent Tea & Coffee Breaks during the day.
- One day of rest per week.

Leave Entitlements

- Annual leave: 30 calendar days
- Sick leave: As per certified medical need.
- Maternity/Paternity leave: According to local labor law.
- Special leave: Marriage, bereavement, or family emergencies.



Section 3: Inclusive Workplace Behavior and Conduct

3.1 Zero Tolerance for Harassment

Explanation:

Harassment includes unwelcome behavior that causes distress or creates a hostile work environment. Harassment—verbal, physical, visual, or sexual—is strictly prohibited.

Types:

- Verbal: Insults, offensive jokes.
- Physical: Unwanted contact, Intimidation or bullying.
- Visual: Offensive images or gestures.
- Sexual: Inappropriate advances, comments.

Our Commitment:

- Investigate every complaint, and the reported complaints are treated seriously and confidentially.
- Reporting:
- Disciplinary action against offenders.
- Regular awareness sessions.

3.2 Reasonable Accommodation

Explanation:

We accommodate individuals with special needs, or religious practices where reasonably possible.

Examples:

- Adjusting workstations for wheelchair access.
- Breaks for prayer.
- Modified (light) duties after an injury.
- Facilities for breastfeeding or pregnancy support

Employee Role:

- Inform HRAD of your needs.
- Respect the differences of others.



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Section 4: Human Rights in Our Supply Chain

Explanation:

Our responsibility extends to the people who work for or with us, including suppliers, contractors, and agencies. Midal Cables seeks to harness the influence of its purchasing to support markets for, and increase accessibility to, more sustainable goods and services including aligning the sourcing with the international guidelines on procurement from the conflict-affected & high-risk areas as prescribed in (CAHRAs-<https://www.cahraslist.net/>) and other applicable and relevant supply chain due diligence e.g., OECD, the Responsible Sourcing Policy MCL-POL-ESG-13 on the company website.

Requirements:

- No child or forced labor.
- Safe working conditions.
- Compliance with wage laws.

Midal Actions:

- Supplier audits and due diligence.
- Periodic audits
- Termination of contracts for violations.
- Supplier engagement and awareness.

Section 5: Grievance Mechanisms (Reporting) & Whistleblower Protection

5.1 How to Report Violations

Employees can report:

- Discrimination or harassment.
- Safety risks.
- Forced labor or unethical practices.

Methods:

- Talk to your supervisor or HRAD.
- Employees can report concerns to HR or anonymously.
- Channels include email, suggestion boxes, and designated officers.



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5.2 Whistleblower Protection

Explanation:

Employees are protected when reporting and no one will be punished for raising concerns in good faith. This is an extension of the existing Whistleblower Protection Policy in the company website

<https://www.midalcable.com/storage/homepage/csr/signed-mcl-whistle-blower-policy.pdf>

Protected Rights:

- File complaints anonymously or openly.
- Participate in investigations.
- No demotion, dismissal, or harassment for speaking up.
- Investigations are prompt, fair, and confidential

Section 6: Training & Awareness

Employee Training Includes:

- Onboarding orientation covering human rights for all new employees.
- Annual refreshers for existing staff.
- Toolbox talks & briefings for contractors.

Supervisory Training Includes:

- Handling harassment reports.
- Detecting risks in supplier relations.
- Coaching for inclusive seniors.

Section 7: Ethical Business Conduct & Integrity

Compliance with the law is the foundation on which Midal Cables' ethical standards are built. Midal Cables, its employees and Midal Associates, are required to comply with all applicable laws, rules and regulations of the countries in which we operate. More details of the company Code of Business Ethics are controlled document MCL-POL-CBE-01 on the company website.

We expect all employees to:

- Be honest and fair.
- Avoid bribery, corruption, or unethical behavior.
- Report conflicts of interest
- Maintain company property and confidentiality.



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Section 8: Monitoring, Evaluation & Compliance

Explanation:

- HR audits our labor practices and safety standards.
- Findings are shared with leadership.
- Non-compliance is subject to disciplinary actions.
- Continuous improvement plans in place.

Indicators Monitored:

- Grievances raised and resolved.
- Overtime hours.
- Accident and incident rates.
- Training participation rates.

Section 9: International and Legal Standards We Follow

Sr.	Standard	Reference
1	Bahrain Labor Law No. 36 of 2012	Legal labor framework in Bahrain
2	ILO Core Conventions	Freedom of association, no forced/child labor
3	UN Guiding Principles on Business & Human Rights	International business responsibility
4	UN Global Compact (Principles 1 & 2)	Human rights and labor compliance

Conclusion

At Midal Cables, respect for human rights is not just policy, it's principle. We expect every employee to uphold this commitment, foster respect, and contribute to a workplace where everyone thrives.

If you have questions about the material contained in this Guide, or would like to provide comments or feedback, please contact the Group GM of HRAD at Midal Cables at Hamd.alshawoosh@midalcable.com