

Policy Control

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NAME	HUMAN RIGHTS POLICY
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Drafted by:	Tiana Vella
Designation	Director of Human Resources
Approved by:	Management Board
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Version Control

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## VON DER HEYDEN GROUP

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### 16.0 HUMAN RIGHTS

#### 1. Scope

Our company is committed to promoting and protecting human rights as protected by international laws through various treaties, conventions, and declarations including the Universal Declaration of Human Rights. This policy sets out the steps we will take to ensure that our operations do not contribute to, or perpetuate human rights violations and that we respect and support the promotion and protection of human rights in all of our activities.

This Policy applies to all employees, officers, directors and contractors of the Group.

#### 2. Policy Statement

**2.1 Non-Discrimination:** Our company prohibits all forms of discrimination, including on the grounds of race, ethnicity, gender, sexual orientation, religion, age, and ability. Refer to VDHG Policy 16.1.

**2.2 Forced Labour:** Our company prohibits all forms of forced labour, including child labor and human trafficking.

The practice of forcing individuals to work against their will, under threat of punishment or harm and without proper compensation, is a gross violation of human rights that denies individuals their freedom and dignity.

As a Group that values human rights, we strongly condemn all forms of forced labour, including child labour and human trafficking. Our commitment to upholding fundamental human rights extends to ensuring that every individual has the right to work in an environment that is safe, secure, and free from exploitation and abuse.

**2.3 Child Labour:** A particularly an abhorrent form of forced labour that deprives children of the opportunity to receive an education and grow up in a safe and nurturing environment. We are firmly committed to preventing and eliminating child labour in all our operations and work closely with our suppliers to ensure they adhere to our standards.

**2.4 Human Trafficking:** We also recognise that human trafficking, the practice of forcibly transporting individuals across borders for the purpose of exploitation, is a severe violation of human rights. Our company maintains a zero-tolerance policy towards human trafficking.

**2.5 Labour Right:** Our company recognises and supports the rights of workers in particular:

*The right to fair wages and benefits:* Workers have the right to receive compensation that is commensurate with their skills and experience, and that provides them with a decent standard of living. This includes the right to overtime pay, sick leave, vacation time, and other benefits.



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*The right to safe and healthy working conditions:* Workers have the right to work in an environment that is free from hazards that can cause injury or illness. This includes the right to protective equipment, training, and access to medical care. Refer to VDHG Policy 12.0.

*The right to freedom of association and collective bargaining:* Workers have the right to form and join trade unions and to engage in collective bargaining with their employers.

*The right to rest and leisure:* Workers have the right to rest and leisure time, including reasonable working hours, weekends, and holidays. This enables them to maintain a healthy work-life balance and to spend time with their families and communities.

*The right to Privacy:* Our company respects the privacy of all employees and other individuals and is committed to protecting personal information.

### 3. Implementation and Monitoring

- 3.1 *Training:* Our company will provide training to employees on human rights and this policy, to ensure they understand their responsibilities and obligations.
- 3.2 *Reporting:* Our company encourages all employees, contractors, and other stakeholders to report any suspected human rights violations or concerns to the Group's Human Resources Department, by sending an email to [vella@vdhgroup.com](mailto:vella@vdhgroup.com).
- 3.3 *Remedy:* Our company will take appropriate steps to address any human rights violations identified and will provide remedy for any adverse impacts on individuals or communities.
- 3.4 *Review:* Our company will regularly review and update this policy to ensure it remains relevant and effective in promoting and protecting human rights.



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### 4. Conclusion

Our company firmly believes in conducting business with the utmost honesty and ethical standards. To this end, we have established a comprehensive policy that sets out our commitment to promoting and protecting human rights across all our operations.

This policy applies to all employees, contractors, and agents who work on behalf of our company. It sets clear guidelines and standards that must be followed to ensure that our business practices align with international human rights standards.

Our commitment to human rights includes, but is not limited to, preventing and eliminating all forms of forced labor, child labor, and human trafficking. We also prioritize the safety and wellbeing of our employees, ensuring that they work in a secure and healthy environment that is free from discrimination and harassment.

As part of our commitment to human rights, we will regularly review and update this Policy to ensure that it remains relevant and effective.