

HUMAN RIGHTS

EXECUTIVE SUMMARY

At EUROAPI we are committed to respecting and promoting human rights across all our business operations. In line with our commitment, we follow the principles of the United Nations Global Compact and United Nations Guiding Principles on Business and Human Rights.

We are vigilant about respecting the rights and principles set out in the Universal Declaration of Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization. We promote diversity, practice fairness, and show courtesy in our interactions with individuals both inside and outside the company.

We have five fundamental principles underlying rights at work:

1. freedom of association and the effective recognition of the right to collective bargaining;
2. the elimination of all forms of forced or compulsory labor;
3. the effective abolition of child labor;
4. the elimination of discrimination in respect of employment and occupation; and
5. a safe and healthy working environment.

This factsheet aims to describe the specific policies and processes implemented by EUROAPI to ensure that the fundamental rights of workers are respected.

EUROAPI's human rights management approach is structured around several functions: the Human Resources Department coordinates the implementation of global policies and ensures that all human resources policies, processes, and practices respect the provisions of these global policies; the Procurement Department establishes processes to ensure that suppliers respect EUROAPI's commitments outlined in these global policies; and the ESG (Environmental, Social, and Governance) Department provides support to operational teams, promotes sharing of best practices, and consolidates data for regulatory and voluntary reporting purposes.

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1. HOW DO WE INCORPORATE OUR COMMITMENT TO RESPECT HUMAN RIGHTS?

1.1. Adopting a human rights statement from top management

As a new multinational company, EUROAPI is committed to respecting the principles of the United Nations Global Compact and other international standards in the field of human rights.

1.2. International standards as an internal reference tool

EUROAPI is committed to respecting the following international standards:

- the UN Guiding Principles on Business and Human Rights;
- the UN Global Compact;
- the Children's Rights and Business Principles;
- the Universal Declaration of Human Rights;
- the OECD Guidelines for Multinational Enterprises; and
- the ILO Declaration on Fundamental Principles and Rights at Work.

1.3. Embedding EUROAPI's commitment in our internal reference documents and processes

For EUROAPI, it is essential that the internal and external documents that govern our activities and business relationships factor in our commitment to respect human rights.

This is why the principles of EUROAPI's commitment to respect human rights can be found in the following documents:

- The Code of Ethics
- The Supplier Code of Conduct

These reference documents present human rights as a core component of the company's values and help embed human rights principles into our company culture. They also set out our expectations with respect to our stakeholders that they meet their responsibilities in respecting human rights by explicitly stating that the criteria in question are to be considered as the minimum applicable standard in cases where local regulations are less stringent in any of EUROAPI's countries of operation.

EUROAPI's human rights commitments described above are publicly available and communicated internally and externally to all our employees, business partners, suppliers, and other relevant stakeholders.

2. DEDICATED POLICIES ON FUNDAMENTAL RIGHTS AT WORK

EUROAPI applies five fundamental principles and rights at work: freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labor, the effective abolition of child labor, the elimination of discrimination in respect of employment and occupation, and a safe and healthy working environment.

To this end, EUROAPI has adopted three internal policies on freedom of association and collective bargaining, prohibition of forced or compulsory labor, and prohibition of child labor. Based on the UN Guiding Principles, these policies define the company's commitments to respect the ILO standards and describe operational due diligence processes and grievance mechanisms to be established. They complement the [Code of Ethics](#) and the [Supplier Code of Conduct](#) to support a comprehensive framework on human rights at work for both the company and its suppliers.

EUROAPI is committed to respecting human rights in all of its activities and business relationships and considers this commitment as the foundation of its ESG approach. All ESG challenges are thus addressed through a human right lens, which means:

- complying everywhere with international human rights standards, interpreted as the minimum requirement for conducting business, and granting specific attention to vulnerable populations, as required by international human rights law;
- preventing and mitigating any adverse human rights impacts caused by business operations on any person, by implementing due diligence processes; and
- allowing all potentially affected stakeholders to express their concerns through grievance mechanisms.

Every employee and subcontractor is aware of the various policies on human rights and individually commits to respect the principles of the reference documents upheld by EUROAPI, both internally and externally.

2.1. Scope of the policies

These global policies apply to all EUROAPI corporate functions, regions, and sites worldwide. Specific measures have been defined to implement these policies in the supply chain.

2.2. Freedom of association and collective bargaining

EUROAPI commits to respect at a minimum the provisions of the ILO conventions 87 and 98 on freedom of association and the right to collective bargaining, without prejudice to more favorable national provisions. It recognizes freedom of association and the right to collective bargaining and requires its suppliers to comply with the same standards. It grants specific attention to vulnerable workers, especially migrant workers.

This means that:

- (1) EUROAPI recognizes that all employees are free to form and/or join a workers' organization of their own choice and does not interfere with this right;
- (2) it prohibits any intimidation, harassment, punishment or discrimination against employees due to trade union activities and does not discourage employees from joining organizations of their own choosing;

- (3) it respects the right to collective bargaining and the role of workers' organizations in collective bargaining and it commits to bargain in good faith;
- (4) it allows workers' organizations to act entirely independently, by giving them reasonable access to the information, resources and means necessary to accomplish their missions;
- (5) in case of conflict between international standards and domestic laws, EUROAPI will refer to international standards and find alternative ways to respect these rights, including by:
 - a. giving employees the opportunity to express collectively their concerns to the company without fear of reprisal, and
 - b. providing open, constructive, and faithful dialogue to resolve matters relating to working conditions and employment terms and relations between employers and workers.

2.3. Prohibition of forced or compulsory labor

EUROAPI commits to respect at a minimum the provisions of the ILO conventions 29 and 105 on the abolition of forced labor, without prejudice to more favorable national provisions. It rejects all forms of forced or compulsory labor (including debt bondage and human trafficking) as defined by these international labor standards and requires its suppliers to comply with the same standards. It grants particular attention to vulnerable workers, especially migrant workers.

This means that:

- (1) EUROAPI is not engaged in and does not support worker exploitation amounting to forced or compulsory labor;
- (2) it gives all employees:
 - a. the right to enter into employment voluntarily and freely, without any threat of penalty, and
 - b. the right to freely terminate employment voluntarily by means of notice of reasonable length at any time and without penalty;
- (3) it ensures that all employment contracts are written and transparent and include comprehensive provisions for employees;
- (4) it guarantees that wages are paid regularly and allows employees and their families to meet their basic needs (according to the local context);
- (5) it respects working time in accordance with the most favorable provisions between international standards or national legislation; and
- (6) it ensures that its intermediaries and recruitment agencies do not use any practices which may lead to forced or compulsory labor.

2.4. Prohibition of child labor

EUROAPI commits to respect at a minimum the provisions of the ILO conventions 138 and 182 on the prohibition of child labor, without prejudice to more favorable national provisions. It rejects all forms of child labor as defined by these international labor standards and requires its suppliers to comply with the same standards.

This means that:

- (1) EUROAPI is not engaged in and does not support any form of child labor;
- (2) employment of persons under the age of 15 or under the legal age for finishing compulsory schooling is prohibited; and
- (3) no hazardous work can be performed by a person under the age of 18.

2.5. Elimination of discrimination in respect of employment and occupation

EUROAPI promotes diversity in the broadest sense possible: non-discrimination, equal opportunity and respect for individuals.

This commitment is based on:

- non-discrimination, which is integrated in our human resources processes;
- equal treatment and equal opportunity for all;
- awareness and training for all employees relevant to their local environments and laws;
- updating policy orientations and priorities on a yearly basis; and
- an established procedure for employees to report complaints.

We prohibit all forms of discrimination and comply with international standards, national laws and regulations in the field of human rights and labor law.

Fostering a stimulating, creative and non-discriminatory workplace environment for all employees and contractors, while ensuring respect for diversity and personal dignity, is part of the EUROAPI Code of Ethics.

For more information, see our [DE&I and Talent Management Factsheet](#).

2.6. Safe and healthy working environment

EUROAPI commits to respect at a minimum the provisions of the ILO conventions 155 and 187 on occupational safety and health, without prejudice to more favorable national provisions. In line with its [HSE Policy](#), it is committed to and takes appropriate action towards the protection of its employees and contractors against sickness, disease and injury at all of its sites and requires its suppliers to comply with the same standards. It grants particular attention to workers exposed to higher risk working environments.

EUROAPI's approach to health and safety is based on risk identification and prevention and includes:

- identifying jobs and occupational hazards;
- conducting occupational hygiene assessments in the workplace;
- implementing risk minimization methods in all situations, for all processes and projects;
- ensuring controls are in place including medical surveillance and the use of personal protective equipment;
- providing employee awareness and training programs on safety, accident and injury prevention, and well-being; and
- providing support and training for managers at all levels of the organization.

3. IMPLEMENTING SPECIFIC AND OPERATIONAL DUE DILIGENCE PROCESSES

EUROAPI implements a global “freedom of association and collective bargaining”, “prohibition of forced or compulsory labor” and “prohibition of child labor” due diligence process:

- at every level of the company, vigilance must be reinforced to ensure the appropriate mitigation of the risk of non-respect of freedom of association and collective bargaining, use or benefit of forced or compulsory labor and use or benefit of child labor, with increased vigilance in countries where the risk of non-respect is considered high;
- adequate internal control measures must be in place to ensure respect of freedom of association and collective bargaining, no use of forced or compulsory labor, and no use of child labor; and
- the procurement risk management model must identify and assess suppliers according to their respect of freedom of association and collective bargaining, the prohibition of forced or compulsory labor, and the prohibition of child labor.

4. GRIEVANCE MECHANISMS

All EUROAPI employees have access to a secure compliance helpline system available 24/7 with a dedicated web page and a toll-free number available in several languages.

If employees have a concern or if they believe in good faith that a law, rule or principle in our Code of Ethics has been or is about to be violated, they can inform their superior or the Ethics and Compliance Department using the compliance helpline. Employees will not be disciplined or discriminated against, provided that they act in good faith and without malicious intent, even if the facts reported prove to be inaccurate or no further action is taken.

The compliance helpline system is equipped to manage any human rights concern, including those related to preserving health and safety (including discrimination, harassment and violence), freedom of association and collective bargaining, the prohibition of child labor and forced or compulsory labor, the protection of confidentiality and intellectual property, conflicts of interest and asset protection, good promotional and distribution practices, protecting privacy and personal data, protection of people and the environment, financial and accounting control rules, fair competition, corruption, and respect for human rights and the 10 principles of the UN Global Compact.

5. MONITORING POLICY IMPLEMENTATION

EUROAPI ensures that adequate resources are available to meet its commitments with respect to freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labor, the effective abolition of child labor, the elimination of discrimination in respect of employment and occupation, and a safe and healthy working environment.

Each country, site, function, or division will design and implement its own Standard Operating Procedure (SOP), in line with both internal policies and local legal requirements.

Internal departments, including the Human Resources Department, Procurement Department and ESG Department, will ensure proper implementation of these internal policies and the respect of human rights within the company and throughout our supplier network.

6. TRAINING EMPLOYEES ON HUMAN RIGHTS ISSUES

EUROAPI knows that in order to integrate its approach and vision of human rights due diligence, the company needs to train and raise awareness on these topics among its employees.

Each employee receives training on the Code of Ethics which outlines the company's expectations with respect to human rights issues. In addition, specific training is conducted online to encourage employee understanding and promote respect for human rights as an integral part of doing business.