

# HUMAN RIGHTS

## EXECUTIVE SUMMARY

At Euroapi we are committed to respecting and promoting human rights, in compliance with the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.

We are vigilant on issues covered by the Fundamental Conventions of the International Labor Organization (including prohibition of child labor and forced labor and respecting freedom of association). We promote diversity, practice fairness, and show courtesy in our interactions with individuals both inside and outside the company.

We have four fundamental principles underlying rights at work:

1. the freedom of association and the effective recognition of the right to collective bargaining
2. the elimination of forced or compulsory labor
3. the effective abolition of child labor
4. the elimination of discrimination with respect to employment and occupation.

To achieve this, Euroapi has adopted three internal policies.

This approach is structured around several functions: the Human Resources Department coordinates the implementation of these Global Policies and ensures that all human resources policies, processes, and practices respect provisions for these Global policies; the Procurement department establishes processes to ensure that suppliers respect Euroapi's commitments outlined in these 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 RESPECTING HUMAN RIGHTS?

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## 1.1. Adopting a Human Rights Statement from top management

Euroapi as a new multinational company is committed to respect 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 for Businesses and Human Rights.
- The UN Global Compact.
- The Children's Rights and Business Principles.
- The Universal Declaration of Human Rights.
- The International Labor Organization Declaration on Fundamental Principles and Rights at Work (especially ILO Convention No. 87 and No. 98 on Freedom of Association and the right to collective bargaining, ILO Convention No. 138 and 182 on Child Labor and ILO Convention No. 29 and 105 on Forced Labor).

## 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 we can find the principles of Euroapi's commitment to respect Human Rights in the following documents:

- The Code of Ethics
- The Suppliers' 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.

All the Euroapi Human Rights Commitments described above are publicly available and communicated internally and externally to all our employees, business partners, suppliers, and others relevant stakeholders.

## 2. DEDICATED POLICIES ON FUNDAMENTAL RIGHTS AT WORK

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Euroapi applies four fundamental principles and rights at work: the 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, and the elimination of discrimination with respect to employment and occupation.

To this end, Euroapi adopted three internal policies on freedom of association, the prohibition of forced labor, and of child labor.

Based on the UN Guiding Principles, these define the company's commitments to respect ILO standards and describe operational due diligence processes and grievance mechanisms to be established.

The 1998 ILO Declaration on Fundamental Principles and Rights at work commits Member States (185 countries) of the International Labor Organization to respect and promote these four principles and rights, whether or not they have ratified the relevant ILO Conventions.

Euroapi is committed to respecting all human rights in 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 people, 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.
- 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 principles of the reference documents upheld by Euroapi, both internally and externally.

For more information, see our [Code of Ethics](#) and the [Suppliers' Code of Conduct](#).

### 2.1. Scope of these policies

These global policies apply to all Euroapi corporate functions, regions, and sites worldwide.

Specific measures will be defined to implement these policies in the supply chain.

### 2.2. Commitments of the policy on the freedom of association and the effective recognition of the right to 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 opt for international standards by finding alternative ways to respect the essence of these rights:
  - a. Giving employees the opportunity to express collectively their concerns to the company without fear of reprisals,
  - b. Providing open, constructive, and faithful dialog to resolve matters relating to working conditions and employment terms and relations between employers and workers.

### **2.3. Commitments of the policy on the 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 trafficking) as defined by these international labor standards 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 is not engaged in or supporting 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.
  - b. The right to freely terminate employment voluntarily by means of notice based on reasonable length at any time, and without any 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 allow 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.
- (6) It ensures that the recruitment of intermediaries and agencies does not use any practices which may lead to forced or compulsory labor.

### **2.4. Commitments of the policy on the effective abolition 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 neither engaged in nor supports any forms of child labor.

- (2) Employment of persons aged 15 or under the legal age for finishing compulsory schooling, is prohibited.
- (3) No hazardous work can be performed by a person under the age of 18.

## **2.5. Commitments of the policy on the elimination of discrimination with respect to employment and occupation**

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

We base our commitment 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.
- 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.

### 3. IMPLEMENTING SPECIFIC AND OPERATIONAL DUE DILIGENCE PROCESSES

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

- At every level of the company, vigilance should 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. Specific attention is being paid 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, the prohibition of forced or compulsory labor, and of the use of child labor.
- The procurement risk management model must identify and assess suppliers according to their respect for freedom of association and collective bargaining, the prohibition of forced or compulsory labor, and the prohibition of child labor.

### 4. GRIEVANCE MECHANISMS

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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 Compliance & Business Integrity Department using the compliance helpline. Employees will not be disciplined or discriminated against provided that they act in good faith and with no malicious intent; even if the facts reported prove to be inaccurate or no further action is taken.

Our compliance helpline covers many areas: 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, respect for human rights and the ten principles of the Global Compact, financial and accounting control rules, fair competition and corruption.

### 5. MONITORING POLICY IMPLEMENTATION

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Euroapi ensures that adequate resources are available to meet its commitments made through these internal policies (the 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 and the elimination of discrimination in respect of employment and occupation).

Each country, site, function, or division will design and implement their own Standard Operating Procedures (“SOP”), in line with both internal Policies and with local legal requirements.

The various internal departments such as 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 also through our suppliers.

## **6. TRAINING EMPLOYEES ABOUT HUMAN RIGHTS**

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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 should be trained online to encourage their understanding and promote respect for Human Rights as an integral part of doing business.