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Introduction



INTRODUCTION

This policy outlines Rovensa's commitment to respecting human rights throughout our operations, supply chain, and business relationships. It provides guidance to employees, suppliers, customers and other stakeholders on respecting human rights and maintaining appropriate conduct. This policy is in alignment with our existing Code of Conduct and Supplier Code of Conduct for both our own workforce and value chain, respectively.

This policy highlights our dedication to upholding human rights standards, both internally and externally, emphasizing their importance in our business operations. We recognize that respecting and promoting human rights at every level—within our workforce, supply chain, and broader communities—is crucial to our business. We aim to protect and promote fundamental human rights, prevent or mitigate any adverse impacts, and strive to avoid complicity in human rights abuses.

We adhere to international human rights standards and are committed to complying with all relevant laws and regulations wherever we operate. In instances where national law conflicts with international standards, we will adhere to the higher standard.

We acknowledge that achieving these standards poses unique challenges in different regions. However, our main goal is to embed them in our direct operations and, moving forward together with our suppliers and business partners, to encourage the adoption of these standards, driving a positive impact on human rights across the world.



SCOPE

The Human Rights Policy applies to the whole Rovensa Group, including its employees, suppliers, customers, local community and also other stakeholders directly or indirectly affected by our business operations.

ROLES & RESPONSIBILITIES

All stakeholders mentioned in the scope are responsible for adhering to this policy and demonstrating integrity in complying with its requirements. Employees should take an active role in ensuring concerns about potential infringement of this policy are reported through formal grievance mechanisms. A shared responsibility to respect human rights must be assumed by suppliers and other business partners, through collaboration on risk analysis and diligence reviews.

Significant developments in Rovensa's human rights initiatives, along with notable impacts and key performance indicators, will be comprehensively reported in the Group's annual sustainability report.

POLICY REVIEW AND UPDATE

This policy should be reviewed whenever necessary to ensure that it remains current and appropriate for fulfilling its purpose. Any change to the policy must be made by the Sustainability Team with the approval of the Executive Management Team (EMT). The Group reserves the right to change the present policy at any time.

Effective date	Version	Owner	Changes
June 2025	1.0	Sustainability Team	First version of the policy

POLICY DISCLOSURE

The policy should be communicated and made available to the organizational structure of Rovensa Group, being permanently accessible to all employees on our intranet, and also to other relevant stakeholders whenever necessary.

EFFECTIVE DATE

The policy will come into effect in June 2025.





OUR COMMITMENT

Rovensa is committed to upholding the principles of dignity and respect for all individuals and is dedicated to promoting and protecting fundamental human rights. As a global company, we foster an environment that honours our values. We ensure respectful working conditions for our own employees and expect the same from our business relationships.

Through our SEEDS values - Safety, Empowerment, Ethic, Dedication, and Striving - we ensure that all individuals directly or indirectly connected to our business, from our own employees to our business partners, are treated with respect, dignity, and fairness, in line with the internationally recognized human rights standards.

We are signatory members of <u>United Nations Global Compact</u>, and committed to upholding and supporting internationally recognized human rights standards, such as:

- The Universal Declaration of Human Rights;
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work;
- 10 Principles of United Nations Global Compact, namely the two principles that explicitly refer to the respect for human rights(Principles 1 and Principle 2).
- **OECD Guidelines for Multinational Enterprises**

By embracing the principles of these standards, we aim to respect, protect, prevent, and mitigate any potential adverse impacts resulting from our business operations. Additionally, we strive to promote positive human rights practices wherever we operate and across our value chain.





OUR FOCUS AREAS ON HUMAN RIGHTS

Our commitment to protecting and promoting human rights is founded on core values and principles that guide our actions both internally and externally. These values are evident in our interactions with employees, suppliers, and throughout our entire business chain. We expect all employees, suppliers, and business partners, whether directly or indirectly associated with Rovensa, to fully embrace these values, as the defense and promotion of human rights is a shared responsibility.

We are dedicated to upholding several key areas of human rights within our own workforce and to influencing our value chain to adhere to the same standards that we uphold:

Child Labour, Forced Labor and Human Trafficking

Child Labour is an infringement of fundamental human rights. We oppose all forms of modern slavery, including child labor, forced labor, human trafficking, the deprivation of personal freedom by employers, and the facilitation of human trafficking for exploitation across all workplaces, operations, and the supply chain. We prohibit the use of child labour in our direct and indirect operations.

Social Dialogue/Freedom of Association

We recognize the importance of employees' rights to freely associate, organize, and engage in collective bargaining/works councils in accordance with applicable legal regulations. Employees have the right to elect their own representatives, and we are committed to maintaining constructive and open dialogue to achieve mutually beneficial agreements. We advocate for this freedom of association also in our value chain (suppliers, customers).

Employee Health&Safety, transportation and commuting

Implementing and maintaining high health and safety standards is essential for protecting employees from workplace, transportation and commuting hazards. We follow established guidelines to ensure a consistent and proactive approach to safety. This includes identifying, assessing, and addressing potential risks, as well as providing regular training. We advocate the exact same standards for all workers in our extended value chain.

Working Conditions

We ensure a safe, fair, supportive, and growth-oriented working environment by maintaining an adequate standard of living for our employees and their families through fair remuneration and compensation. We provide compensation to employees on both permanent and temporary contracts that exceeds the legal minimum wage in each country.

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OUR FOCUS AREAS ON HUMAN RIGHTS

Additionally, we offer continuous training and development opportunities to help employees enhance their skills and advance their careers (career management and training). We also advocate the same working conditions for all workers in our extended value chain. We ensure that working hours are reasonable and comply with legal standards to prevent overwork and promote work-life balance.

Discrimination, Violence and Harassment

We strive to uphold a workplace that is free from any kind of discrimination and any attitudes or behaviors that may be perceived as harassment and/or violence. Practices that discriminate based on, race, sexual orientation, political affiliation, disability, religion, age or gender are not tolerated. Such practices are also not tolerated in the rest of our value chain.

Diversity, Equity and Inclusion

We value diversity and cultivate a culture that enables every individual to contribute to their fullest potential. We ensure to uphold principles of equity and inclusion in each of our internal processes (equal treatment and opportunities for all) and promote diversity within our operations wherever possible. All our employees, suppliers, customers and other third parties we work with are expected to respect equity, diversity, and the rights inherent to every human being as per our <u>Diversity</u>, <u>Equity</u>, <u>Inclusion and Belonging Policy</u>.

Privacy and Data Protection

Respecting employees' privacy and data protection in the workplace, according to applicable EU and national legal rules in data protection, privacy and information security as per our privacy policy and supplier code of conduct.

Other work-related human rights

We acknowledge that our business activities may impact human rights in nearby communities, such as water, sanitation, and land use.

We are committed to continuously improving our production processes to minimize environmental impact, to safeguard public health, environmental protection, and overall communities' well-being.





GOVERNANCE

We view the effective management of human rights as an ongoing and comprehensive responsibility that requires a robust management structure to ensure:

- Integration into Business Processes: Integrate this policy into our ways of working and business processes.
- Comprehensive Risk Analysis and Diligence Reviews: Identify human rights risks through comprehensive risk analysis and diligence reviews at least once a year, and as needed.
- **Preventive and Remedial Measures**: Mitigate these risks by implementing preventive measures and applying suitable remedial actions if violations occur.
- **Regular Evaluations**: Conduct regular evaluations of the effectiveness of our preventive measures, remedial actions, and grievance mechanisms.

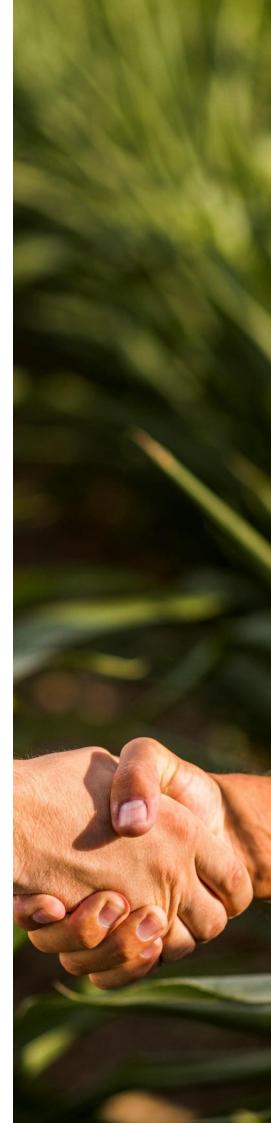
The Executive Management Team holds accountability for the delivery of human rights commitments, ensuring that there is toplevel oversight and commitment.

The Sustainability Department is responsible for overseeing the implementation of human rights policy across the organization, ensuring that the company's commitments are met and continuously improved upon.

The implementation and monitoring of this policy are handled by an internal Human Rights Core Team, which involves multiple departments.

The Core Team includes professionals from Global Human Resources, Procurement, Marketing, Audit & Risk, Legal, Health and Safety, and Sustainability. They ensure comprehensive coverage and integration of human rights into all business operations, safeguarding that:

- •Human rights are respected in their respective areas of expertise.
- •Support is provided for improving internal processes, implementing training, and providing advice.





GRIEVANCE MECHANISM

We provide access to a global whistleblowing channel, which serves as a secure and confidential grievance mechanism for reporting concerns. This channel enables anyone to report unethical behavior, misconduct, or human rights violations, thereby reinforcing our commitment to transparency and accountability.

The grievance mechanism is open to employees and external stakeholders, including contractors, suppliers, customers, and other business partners that have direct working relationships with Rovensa. These parties can report potential infringements related to company policies, legal compliance, or human rights concerns.

By making this grievance mechanism accessible to all stakeholders, Rovensa aims to ensure that all voices can be heard and that appropriate actions can be taken in response to reported issues. This contributes to early risk identification, mitigation, and remedy.

As such, if one of our business partners is found to have breached one of our human rights commitments outlined in this policy, our Supplier Code of Conduct, or any contractual agreement with suppliers or customers, appropriate measures will be taken.

