

## HUMAN RIGHTS POLICY

Effective Date	Responsible Dept.	Approved by	Version	Approval Date
05.08.2023	Human Resources	Board of Directors	1	05.08.2023
			2	02.08.2025

### Introduction

At **Epigral**, we are dedicated to upholding the principles of fairness, respect, and dignity for all. Our unwavering commitment to responsible business practices extends to honoring the rights and well-being of our communities, employees, and those impacted by our operations.

### Purpose and Scope

Epigral is steadfast in its commitment to responsible and ethical conduct, a core principle reflected in our Purpose and Scope. We prioritize treating all individuals with dignity and respect, while consistently adhering to the laws, regulations, traditions, and cultures of the countries in which we operate. Our unwavering dedication to the well-being and human rights of our employees aligns seamlessly with the Sustainable Development Goals.

Guided by comprehensive international frameworks, our commitment to upholding human rights is rooted in specific documents that outline fundamental principles. The International Bill of Human Rights encompasses the Universal Declaration of Human Rights, emphasizing civil, political, economic, social, and cultural rights. This includes the right to life, freedom of expression, and the right to work under fair conditions. Additionally, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work underscores core labour standards, promoting freedom of association, elimination of forced and child labour, non-discrimination, and the right to collective bargaining. By adhering to these frameworks, we ensure a holistic approach to respecting and safeguarding human rights within our operations.

In cases where national laws and international human rights standards differ, we pledge to adhere to the higher standard. Should conflicts arise, we prioritize compliance with national laws while striving to uphold international human rights to the greatest extent possible.

This policy extends to all individuals associated with **Epigral**, including employees, Directors, temporary staff, agency workers, contractors, suppliers, and those representing our company. We expect all employees to fully comply with our policies and report any suspected misconduct, noncompliance, or unethical behaviour. It is essential to note that this policy does not form part of any employee's contract and may be subject to amendments as needed.

Our Human Rights principles are firmly integrated into our Code of Conduct for employees and our Supplier's Code of Conduct, which applies to our suppliers and customers.



## Key Principles:

- 1. Labour Rights:** We respect the right of all employees to freely choose employment, and we prohibit child labour, forced labour, and human trafficking in all forms. We commit to fair wages, working hours, and the provision of a safe and healthy working environment.
- 2. Non-Discrimination and Equal Opportunity:** We are committed to promoting diversity and inclusion, ensuring that all employees are treated with respect, dignity, and fairness. We will not tolerate any form of discrimination based on race, ethnicity, gender, sexual orientation, disability, or any other protected characteristic.
- 3. Freedom of Association:** We recognize and respect the right of employees to freely associate, form trade unions, and bargain collectively in accordance with local laws.

**Health and Safety:** We ensure that our workplaces are safe, promoting the health, safety, and wellbeing of all employees. This includes proactive measures to prevent accidents, injuries, and occupational illnesses.

Through this comprehensive policy, we outline our resolute commitment and responsibility to uphold and respect human rights at every level of our organization.

## (1) Our commitment to the Community

At the heart of our principles lies a deep-seated dedication to our community. We value and embrace diversity, acknowledging the distinctive strengths that emerge from the diverse array of people, talents, and capabilities within our organization. This diversity serves as a dynamic catalyst that enables us to reach our utmost potential.

Our unwavering commitment to upholding and honoring human rights extends not only within our enterprise but also throughout our network of external partnerships. We acknowledge the significance of protecting the rights of individuals who may be susceptible to human rights infringements. These individuals encompass, but are not confined to, women, ethnic or religious minorities, LGBTQ+ individuals, and those with disabilities. We steadfastly believe that cultivating an atmosphere of inclusivity and reverence fosters a more resilient and compassionate community.

Our decisions are shaped by this principle, ensuring that we advocate for the rights and dignity of each person, both within our organization and in all facets of our undertakings.

## Targets:

- Ensure 100% of employees' complete diversity and inclusion training by 2028, promoting an understanding of human rights and equality.
- Achieve a 3% representation of women, minorities, LGBTQ+ individuals, and people with disabilities in the workforce by 2028, fostering a more inclusive workplace.



## (2) Upholding Ethical Standards: Our Pledge Against Modern Slavery and Ensuring Free Choice in Employment

At our core, we are deeply committed to eradicating modern slavery in all its manifestations. We emphatically denounce any form of coerced, bonded, or indentured labour, as well as involuntary prison labour and human trafficking. Recognizing modern slavery as a severe crime and a direct infringement on basic human rights, we stand firm in our uncompromising stance on this critical issue.

Modern slavery can manifest in various insidious forms, such as slavery, servitude, child labour, forced and compulsory labour, and human trafficking. All of these deplorable practices share the common thread of depriving individuals of their freedom to exploit them for personal or commercial gain.

Our position on modern slavery is unequivocal – we maintain a zero-tolerance policy. Upholding ethics and unwavering integrity are the cornerstone of all our business transactions and partnerships. To effectively combat modern slavery, we have implemented robust systems and rigorous controls across our organization and supply chains.

In accordance with our commitment, we have set the minimum age for employment within our company at 18 years on a global scale. However, we acknowledge that local laws may establish a higher age for work or mandate schooling. In such cases, we wholeheartedly adhere to the higher age requirement, respecting and advocating for the well-being of young individuals.

Through our policies and actions, we are resolutely dedicated to eliminating modern slavery wherever it may persist, establishing an environment characterized by dignity, freedom, and equity for all.

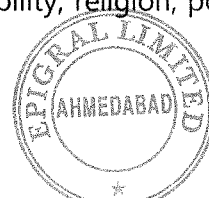
### Targets:

- Inform at least 50% of suppliers, contractors and service providers (by procurement value) about ethical labour standards, including the prohibition of child and forced labour, by 2028.
- Ensure 100% of employees are appropriately informed on identifying and preventing modern slavery practices by 2028.

## (3) Fostering Inclusivity and Fairness: Our Pledge Against Discrimination

Within our organization, we hold steadfast to the belief that every person deserves to be treated with fairness, respect, and dignity. We have a strict zero-tolerance policy in place to combat bullying and harassment, creating a welcoming and supportive atmosphere for everyone.

Discrimination finds no foothold within our company. We are resolute in our dedication to champion equality and diversity, refraining from any discriminatory actions or decisions based on factors such as age, gender, sexual orientation, gender identity, pregnancy, marital status, race, colour, ethnicity, disability, religion, political beliefs, or union membership.



By embracing the unique strengths and viewpoints that each individual brings, we harness the power of diversity to stimulate innovation and cultivate a culture of unity. Our goal is to establish a workplace where each person feels appreciated, valued, and empowered, free from any form of bias or prejudice.

Through proactive initiatives and continuous education, we endeavour to nurture a work environment that celebrates individuality and fosters a sense of belonging for all members of our organization. Together, we stand in unity in our pursuit of an authentically inclusive and non-discriminatory workplace.

### **Targets:**

- Achieve a 1% increase in female representation in leadership positions by 2028.
- Ensure 5% of new hires in each region come from diverse backgrounds by 2028.

## **(4) Promoting Dignity and Respect: Our Commitment to Fair Treatment**

At our organization, we are dedicated to fostering a workplace culture that prioritizes the well-being and dignity of every worker. We firmly uphold a zero-tolerance policy against any form of harsh and inhumane treatment.

We firmly stand against acts of sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers. Our commitment extends to ensuring that no worker faces any threat of such treatment within our organization.

Creating a safe and supportive work environment is of utmost importance to us. We actively work to promote open communication, encourage empathy, and cultivate a sense of mutual respect among all members of our workforce.

Through ongoing training and clear communication of our policies, we strive to empower our employees to speak up and report any concerns they may have. We view every report seriously and take prompt and appropriate actions to address any issues related to fair treatment.

### **Targets:**

- Ensure that 100% of reported incidents of harassment or abuse are investigated and resolved within 30 days by 2028.
- Ensure 100% of employees complete annual training on recognizing and preventing harassment, abuse, and coercion by 2028.

## **(5) Our Commitment to Equal Opportunities**

In our organization, we firmly believe that each individual should have the opportunity to thrive based on their personal ability, valuable contributions, and untapped potential. Our unwavering commitment lies in promoting, supporting, and upholding a culture deeply rooted in fairness, respect, and equal opportunity for all.



Recruitment and promotions within our company are solely based on merit, recognizing and valuing the unique skills and talents that each person brings to the table. We create a level playing field, ensuring that every member of our workforce has the chance to grow and advance in their careers without bias or discrimination.

By fostering an inclusive and diverse environment, we empower individuals from all backgrounds to excel and contribute to our collective success.

We actively promote the spirit of teamwork and collaboration, celebrating the diversity of perspectives and experiences that enrich our organization.

Our commitment to equal opportunities goes beyond mere words. We continually assess our policies, practices, and processes to ensure they are fair and equitable for everyone. Embracing the principles of fairness and respect, we cultivate an environment where every employee feels valued, heard, and inspired to reach their full potential.

### **Targets:**

- Ensure 100% of promotions are based solely on merit, with zero bias or discrimination, by 2028.
- Ensure 100% of employees are appropriately informed of diversity and inclusion environment within the Organization by 2028.

## **(6) Fair Compensation and Respect for Working Hours: Our Pledge**

At our organization, we hold steadfast to the principles of fair and honest employment practices. Our commitment extends to complying with all national legal requirements concerning wages, encompassing minimum wages, overtime hours, mandated benefits, and working hours.

We firmly believe that every employee should be compensated fairly for their valuable contributions. Our remuneration policies adhere to local laws, ensuring that minimum wage standards are met and that overtime compensation is provided when required.

Moreover, we diligently respect and adhere to regulations regarding working hours, ensuring that our employees' time is valued and protected. We prioritize their well-being and work-life balance, acknowledging that a healthy and productive workforce is nurtured through reasonable working hours.

Transparency and accountability lie at the core of our compensation practices. We communicate openly with our employees about their pay structures and provide clarity on how we adhere to legal requirements.

Our dedication to fair compensation and respect for working hours is more than a commitment; it is an integral part of our ethos. We continuously review and refine our practices to ensure that we remain in alignment with evolving labour laws and industry best practices.



## **Targets:**

- Implement work-life balance programs that ensure at least 75% employee satisfaction with working hours and flexibility by 2028.
- Achieve 100% compliance with national minimum wage standards and overtime regulations across all operations by 2028.

## **(7) Prioritizing Health and Safety: Our Commitment**

At **Epigral**, the well-being and safety of every individual working for or with us is of paramount importance.

We firmly prioritize health and safety, striving to provide a secure working environment and fostering a culture that values the protection of all team members.

We are deeply committed to upholding excellent safety management practices throughout our organization. This involves regular reinforcement and enhancement of safety protocols, ensuring that our workplace remains a space where everyone can carry out their tasks confidently and securely.

By maintaining a proactive approach, we continuously raise awareness of safe working methods. We invest in comprehensive training programs to equip our employees with the knowledge and skills needed to uphold the highest standards of safety in their roles.

Our dedication to health and safety extends beyond the confines of our organization. We collaborate with all those who work alongside us, fostering a shared commitment to a safe working culture across the board.

## **Targets:**

- Achieve a 100% reduction in workplace accidents, aiming for zero reported incidents by 2028.
- Ensure 100% of employees complete annual health and safety training programs by 2028.

## **(8) Upholding Integrity in Our External Collaborations: Our Approach to Third-Party Relations**

Within our company, we hold a deep reverence for honesty and integrity, not only within our internal operations but also in our engagements with customers and suppliers. We establish clear expectations for our external associates, urging them to uphold the same ethical principles we adhere to. To achieve this, we have instituted a robust Supplier Code of Conduct that mirrors the principles and commitments of our overarching Policy.

Our Supplier Code of Conduct is a comprehensive document that delineates the values and conduct we anticipate from our customers and suppliers. It serves as a guiding framework for conducting business in a responsible and ethical manner.



We cultivate an atmosphere of openness and transparency, where third parties are actively encouraged to report any instances, they believe may contravene the standards outlined in the Code of Conduct. To facilitate this, we offer an internal email address where concerns can be shared confidentially.

This two-way channel of communication enables us to collaborate effectively with our external partners, ensuring that together we uphold the highest ethical standards and preserve trust in all our business affiliations.

**Targets:**

- Ensure 50% of suppliers, contractors and service providers (by procurement value) are made aware of Epigral's Supplier Code of Conduct by 2028.
- Ensure 50% of the suppliers are communicated for adherence to Epigral Supplier Code of Conduct by 2028.

**(9) Empowering Employee Rights: Our Commitment to Freedom of Association**

At our organization, we firmly believe in upholding the fundamental right of employees to exercise freedom of association and engage in collective bargaining. We recognize and deeply respect the rights granted to our employees under local and national laws, including the right to participate in legitimate and lawful trade union activities.

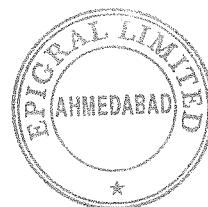
We actively support and encourage an environment where employees can freely associate and collectively bargain, fostering open dialogue and collaboration between our workforce and management. Our commitment to employee empowerment extends to ensuring that those who participate in lawful trade union activities face no reprisals or deterrence.

Our dedication to protecting the rights of our employees goes beyond mere words. We actively promote awareness and understanding of their rights, ensuring that they have access to the necessary resources and information related to their freedom of association.

As a responsible employer, we value the perspectives and contributions of our workforce. By fostering a culture of open communication and mutual respect, we create a workplace where every individual's voice is heard and respected, and their rights are upheld without compromise.

**Targets:**

- Ensure 100% of employees are appropriately informed on freedom of association and collective bargaining rights by 2028.



## (10) Grievances and Remediation

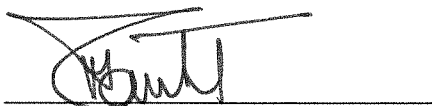
At **Epigral**, we firmly uphold a culture of accountability and transparency, providing a secure avenue for any employee, Director, worker, or contractor to report legitimate concerns related to business wrongdoing or malpractice. We take such matters seriously and encourage our employees to speak up if they suspect misconduct or unethical behaviour within our organization or involving any third-parties we conduct business with worldwide.

Our comprehensive 'Speak Up' procedure outlines the steps to report concerns effectively. Employees are empowered to raise their issues orally or in writing through their immediate manager or line manager. For further escalation, they have the option to approach the Senior Management Team, including Senior Managers within their business function, Human Resources, Legal, or Finance Business Partners. Additionally, concerns can be reported via email to [humanrights@epigral.com](mailto:humanrights@epigral.com), which is managed by the Company Secretary.

To ensure confidentiality and accessibility, we provide a confidential internal email id and are also available through telephone, to accommodate reporting preferences. Our commitment to open communication and ethical practices is further reinforced by embedding the 'Speak Up' procedure within our legal compliance policies and employee training, and by communicating it through our intranet.

We emphasize that reporting concerns is not only welcome but encouraged, as it helps us maintain the high standards set out in our **Epigral** Code of Ethics and Conduct. By fostering an environment of trust and accountability, we strengthen our resolve to uphold ethical practices and ensure that any identified issues are addressed promptly and appropriately.

Where we have identified adverse human rights impacts caused or contributed to by our business activities, we are committed to providing for or cooperating in their fair and equitable remediation through legitimate processes. We expect the same of our suppliers and other business partners. Where we believe **Epigral** is directly linked to adverse impacts through our relationships with suppliers or business partners, we seek to engage and collaborate with them to promote appropriate remediation through their own grievance management processes.



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