



Group Policies

Labor and Human Rights



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1. Our statement

Our statement for Labor and Human Rights has the aim to formalize our actions and behaviour to develop an organizational culture supporting internationally Labor and Human Rights and avoid abuses. The principles in this policy are consistent with principles contained in the Universal Declaration of Human Rights, The United Nations Global Compact, the OECD Guidelines for multinational enterprises, the ILO Declaration on Fundamental Principles, Right at Work, United Nations Guiding Principles on Business and Human Rights and The UN "Protect, Respect and Remedy".

2. Scope

All directors, officers, associates, and representatives of Group companies, which include personnel authorized to act on Group's behalf in any of the Company's operations, including operations conducted by any departments, subsidiaries, agents, consultants, or other representatives, and joint ventures are required to comply with this Policy. Group also expects its suppliers, vendors, and subcontractors share its commitment to human rights and equal opportunity in the workplace. The principles set forth in this document are generally derived from the following Governance Documents:

- code of ethics
- suppliers' code of conduct

3. Field of application

All Polynt - Reichhold companies.

4. Purposes

We are committed to:

- providing a workplace that doesn't use forced or child labor, that respects the rights to freedom of association and collective bargaining.
- providing a workplace that is free from discriminatory practice on the basis of race, color, gender, national origin, sexual orientation, age, religion, or disability and harassment.
- compensating associates with competitive wages based on local market assessments and to complying with all laws regarding conditions of employment including basic and overtime working hours.
- respecting health and safety laws to protect its employees and people that work for the

Group.

- respecting the cultural values of the communities in which it operates.
- promoting its values to its suppliers, vendors, subcontractors, consultants, agents and partners and expects them to adhere to these values.
- being attentive to concerns raised by stakeholders and to work with stakeholders to support human rights within its activity.

5. Our approach to policy implementation

In order to achieve the policy objectives, Group will undertake the following:

- Line management is also responsible for developing and implementing local processes and procedures where relevant.
- Implement the policy through the training
- Encourage to use whistleblowing portal <https://polynt.integrity.complylog.com/> to report of suspected violations of this policy
- Suspected violations will be investigated in depth by Group ESG Manager and Group General Counsel, HR&IT Director taking the appropriate corrective actions
- Group Internal Audit conducts, periodically, a Policy audit in accordance with the Corporate ESG compliance program; Audit recommendations will serve, when necessary, to update the Policy with respect to its effectiveness.

6. Roles, Responsibilities and oversight

The overall responsibility for determining Group's Labor and Human Rights policy and its implementation lies with the Managing Board composed by Top Management of the Group.

All managers, everyone for own responsibilities, must implement this policy and keep it effective and in case of doubt or problem can contact Group ESG.

7. Approval and Review

Labor and Human Rights policy is reviewed by the company on a yearly basis to address evolutions of the company, best practices, business drivers and relevant regional/global legislation. It is emitted by Group General Counsel, HR&IT Director and approved by the Group CEO. This policy keeps a track-record of each update approved.

8. Information and communication

All managers indicated in the distribution list are responsible for informing their organizations of

the contents of this procedure and its due application. Some responsible needs to send this policy to the external stakeholders (i.e. Supply chain sends to suppliers to inform about our Labor and Human Rights principle).

