

Labour and Human Rights Policy

Sidenor requires its subsidiaries, hereinafter “Sidenor companies”, to incorporate into policies the following Labour and Human Rights policy:

Sidenor companies recognise the right of all employees and stakeholders to work with dignity and believe that everyone in the Companies is responsible for having due regard for human rights.

Within Sidenor, commitment on ethical principles is vitally important. Sidenor companies support the fundamental principles, as articulated in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines and the ILO Declaration of Fundamental Principles and Rights at Work. Sidenor companies support the protection of international human rights across the business value chain, and will not be complicit in human rights abuses. The Companies’ policies and procedures adhere to all applicable national laws concerning freedom of association and collective bargaining, non-discrimination, forced labour and underage workers in the workplace.

Sidenor commitment relies on morals concerning the fundamental human rights set out in the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

Non-discrimination

Sidenor respects diversity and avoids any form of unfair or unlawful discrimination in employment or occupation, in conjunction with promoting a culture where people recognise the value a diverse workforce brings. Sidenor companies hire, assess, remunerate and administer in a manner that does not discriminate in respect to gender, race or ethnicity, nationality, religion or other beliefs, age, marital status, disability, sexual orientation, political opinion, union affiliation, social or educational background. Workplace diversity at all levels is encouraged.

Equality and equal opportunities

Sidenor companies do not tolerate any discrimination based on gender, race or ethnicity, nationality, religion, age, social or educational background, disability, belief, sexual orientation, or political and trade union engagement. These principles apply to the recruitment of new employees, to employees with an employment contract, and to the professional promotion of employees. The only decisive factors of employment are performance, experience, personality, efficiency, skills, qualifications, and conduct.

Freedom of association

Sidenor companies uphold freedom of association and the effective recognition of the right to collective bargaining. Sidenor companies shall retain an open and constructive dialogue with its employees and shall respect employees’ rights to freely associate, organize, and bargain collectively in accordance with applicable laws and regulations, in support of their mutual interests.

Forced labour

Sidenor companies reject any form of forced labour. All work performed in the companies and their business partners must be voluntary. No form of forced, compulsory labour is tolerated at Sidenor companies.

Underage workers

Sidenor companies prohibit the employment of individuals under the applicable statutory minimum age for workers and in any case, at a minimum age of 18, except in the cases of vocational training for young individuals. Sidenor is against all forms of exploitation of children. The companies do not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities and legal restrictions. Sidenor companies expect their business partners and associates to have and uphold similar standards and abide by country-governing laws in countries wherein they operate.

Harassment at workplace

Harassment (including all forms of sexual harassment and harassment based on other legally protected categories), bullying, rude or disrespectful behaviour and lewd comments are not allowed. Sidenor companies prohibit any acts or threats of violence while conducting business on or off the Companies' premises and in regards to external stakeholders or within the Companies' people and management.

Working conditions

Sidenor companies compensate their employees with wages and benefits that meet or exceed the legally required minimum. Contracts must have written agreements on employment, containing agreed terms and conditions. Employees at Sidenor companies are ensured the respect of working hours set on national laws and relevant industry standards. Overtime work is voluntary and employees are compensated for overtime work in accordance with local laws. Training is provided to all employees and Sidenor companies are committed to equality of access to development and education opportunities.

Sidenor companies must ensure that all employees enjoy a safe and healthy working environment and provide, a general wellbeing in the workplace. Sidenor companies commit to continuously improve health and safety performance by integrating Health and Safety aspects in all operations.

Whistleblowing

Sidenor companies' employees are encouraged to raise any concerns regarding violations in the implementation of this policy and the Business Code of Conduct, including harassment, intimidation or discriminatory behaviour to employees, serious health and safety risks that could threaten the health and safety of employees, as well as the general public or customers. Sidenor companies will accurately evaluate reported matters and where appropriate, will adopt specific corrective measures to remediate all valid reported issues. Transparent communication on any identified human rights violations will be publicly available by Sidenor companies.

Compliance

All Sidenor companies shall comply with the provisions of this labour and human rights policy as well as national laws and regulations. All Sidenor companies must assess the implementation of the Labour and Human Rights policy in the planning and design of new business activities. Should there be differences between the content of this policy and the national laws or other applicable standards, the more rigorous requirements shall apply.

Governance and accountability

Responsibility for the implementation of this Policy lies with the most senior executive responsible for each company.