

## Labour and Human Rights Policy

This policy reflects zero tolerance shown by Siderom as regards the violation of labour and human rights. Siderom's commitment to human dignity, promoting ethical practices, and safeguarding the rights of all employees and stakeholders. The policy has been developed taking into consideration the interests of key stakeholders of Siderom, and applies to all employees, officers, directors, contractors, agents and private security forces, as well as all entities and subsidiaries controlled by the company. The policy applies to all operations and business activities, regardless of the country in which the company operates, as well as the upstream and downstream value chain of Siderom.

This policy is developed to address labour and human rights' related material negative impacts such as potential violations of human rights and labour law. The policy also incorporates relevant risks, such as litigation and reputational risks.

Siderom is committed to upholding the fundamental principles of human rights, as articulated in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, as well as the UN Declaration on the Rights of Indigenous Peoples and ILO Convention 169 on Indigenous Peoples. These commitments extend across the entire value chain, ensuring that all employees, suppliers, and partners uphold these standards. This policy includes a strong stance against workplace discrimination on the grounds of gender identity.

Siderom shall comply with the provisions of this labour and human rights policy as well as national laws and regulations. Siderom 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.

### Non-discrimination and diversity

Siderom ensures that no discrimination occurs based on gender, race, colour, ethnicity, nationality, religion, beliefs, age, marital status, disability, sex, sexual orientation, gender identity, political opinion, union affiliation, gender identity, or social and educational background. Hiring, assessment, remuneration, and promotion processes must be fair, transparent, and free from bias, supporting workforce diversity and inclusion at all levels.

Protection of women's rights, as well as rights of groups at particular risk of vulnerability and commitment to non-discriminatory practices in every aspect of the business are emphasized in this policy. Qualifications, skills and experience serve as the basis for the recruitment, placement, training and advancement at all levels, while accounting for the fact that some individuals may have more difficulty than others to acquire such qualifications, skills and experience. Siderom has programs that promote access to skills development.

Siderom will report annually on workforce diversity metrics and equal opportunities.

### Equality and equal opportunities

Siderom ensures equal treatment in all employment decisions, from recruitment to promotion. The company's processes emphasize the evaluation of employees based on their performance, skills, qualifications, experience, and conduct. Any discriminatory practices are prohibited, and these will be transparently reported.

### **Freedom of association and collective bargaining**

Siderom upholds freedom of association and the effective recognition of the right to collective bargaining. Siderom 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.

These commitments are regularly monitored, and any breaches are addressed with corrective actions. The company adheres to ILO conventions and standards governing union rights.

### **Forced labour**

Siderom strictly prohibits all forms of forced or compulsory labour. All work performed must be voluntary, and no forced, bonded, or involuntary labour practices are tolerated across the company or its supply chains. Siderom commits to due diligence processes to identify and mitigate risks related to forced labour and report any violations transparently.

### **Child labour**

Siderom ensures compliance with the ILO's minimum age requirements for workers, with the minimum legal age for employment set at 18 years, except in cases of legally regulated vocational training. The company is committed to preventing the exploitation of children and ensuring that no child labour occurs within Siderom or its supply chain. Regular audits and assessments will ensure compliance with these standards.

### **Harassment and workplace behaviour**

Siderom commits to maintaining a respectful, harassment-free workplace, prohibiting any forms of harassment, bullying, trafficking or violence. This includes sexual harassment, and any behavior based on protected categories. The company will actively investigate and address any reported instances of harassment, ensuring corrective actions and transparent reporting of outcomes.

### **Working conditions**

Siderom commits to providing fair wages and benefits that meet or exceed legal requirements and to ensuring that employment contracts outline all agreed terms and conditions in a transparent manner. Working hours will comply with national laws and relevant industry standards, and any overtime will be voluntary and fairly compensated.

In addition, Siderom will provide reasonable notice (prior to decision) to representatives of workers in case of change in their operations that would have a major impact on employment to mitigate to the maximum extent practicable adverse effects.

### **Occupational health and safety**

Siderom ensures a safe and healthy working environment. Continuous improvement of health and safety performance is a key focus, and health and safety considerations are integrated into all operational processes. Regular health and safety audits, along with transparent reporting on incidents, are conducted. The company is committed to ensuring that private security forces respect human rights in all their operations. Through the relevant "Occupational Health & Safety" policy, Siderom is committed to achieving the ultimate goal "No accidents, no occupational illnesses."

### **Whistleblowing**

Siderom's 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. Siderom will accurately evaluate reported grievances 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 Siderom.

### **Due diligence and risk assessments**

Siderom is committed to conducting human rights due diligence or risk assessments across its operations and supply chains to identify, prevent, and mitigate potential risks. These assessments will guide the development and implementation of programs addressing industry-specific human rights exposures. The company will also communicate this policy to all personnel and external stakeholders to ensure full understanding and compliance.

### **Monitoring, reporting, and remedy**

Siderom is committed to monitoring and reporting on human rights impacts annually, including any potential impacts on industry specific human rights. Should any negative impacts arise, the company will provide appropriate remedy to correct them. A robust review mechanism is in place to ensure that the policy is regularly evaluated and updated as necessary.

### **Stakeholders' engagement**

Siderom is committed to involving affected stakeholders in the development and implementation of its human rights policy. This includes engagement with own employees, suppliers, customers, business partners, communities, indigenous people and other relevant parties to ensure that human rights concerns are addressed effectively.

### **Training and awareness on labour and human rights**

Siderom will ensure that employees receive adequate training and guidance on sound human rights practices, tailored to their roles and areas of influence.

### **Governance and accountability**

Approval and responsibility for implementing this Policy lies with the most senior executive responsible for Siderom. The executive will ensure that labour and human rights considerations are fully integrated into corporate strategy and operations, with regular oversight by the Administrators.

Siderom will establish governance mechanisms to monitor, assess and manage human rights impacts and risks. Performance will be reported annually as part of the company's broader sustainability reporting obligations, ensuring compliance with both ESRS and applicable national and international standards.

### **Distribution and communication**

It falls into the responsibilities of Siderom's management to communicate the content and the spirit of this document to all personnel, direct and associated, also to stakeholders. This policy is published and posted on the company's intranet (or in other internal communication tools) and official corporate website.

The policy will be reviewed annually to ensure compliance with all relevant legal requirements and any other relevant updates.