

Labour and Human Rights Policy

Scope and application

This policy reflects zero tolerance shown by Sidenor as regards the violation of labour and human rights. Sidenor 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, and applies to all employees, officers, directors, contractors, agents and private security forces, as well as all entities and subsidiaries controlled by the company.

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.

Sidenor 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.

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

Sidenor ensure 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. Sidenor has programs that promote access to skills development.

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



Equality and equal opportunities

Sidenor ensure 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

Sidenor uphold freedom of association and the effective recognition of the right to collective bargaining. Sidenor 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

Sidenor strictly prohibit all forms of forced or compulsory labour. All work performed must be voluntary, and no forced, bonded, or involuntary labour practices are tolerated across Sidenor or their supply chains. The companies commit to due diligence processes to identify and mitigate risks related to forced labour and report any violations transparently.

Child labour

Sidenor ensure 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 the company or its supply chain. Regular audits and assessments will ensure compliance with these standards.

Our target is to retain an underage employment rate of zero

Harassment and workplace behaviour

Sidenor commit 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.

Our target is to have zero discrimination and harassment in the workplace.

Working conditions

Sidenor commit 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, Sidenor 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

Sidenor ensure 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, Sidenor is committed to achieving the ultimate target "No accidents, no occupational illnesses."

Whistleblowing

Sidenor'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. Sidenor 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 Viohalco companies.

Due diligence and Risk assessments

Sidenor is committed to conducting human rights due diligence or risk assessments across their 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 companies will also communicate this policy to all personnel and external stakeholders to ensure full understanding and compliance.

Monitoring, Reporting, and Remedy

Formal Review Mechanism: The labour and human rights policy and the associated human rights Guidelines are subject to a formal and structured review mechanism to ensure their continued relevance, effectiveness, and alignment with regulatory requirements, international standards, and the Company's sustainability strategy.

The review process is conducted at least every **two years**, or more frequently where required due to:

- regulatory changes (e.g. Sustainability, data protection frameworks)
- updates in international standards (e.g. UN, OECD, ESRS)
- identified risks, incidents, or audit findings
- significant organizational or operational changes

The review is coordinated by the **Sustainability function**, in collaboration with key internal stakeholders (Legal, HR, Internal Audit, and Senior Management).

Stakeholders' engagement

Sidenor 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

Sidenor 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

The Company has established a structured governance framework to ensure the effective implementation, oversight, and continuous improvement of its labour and human rights policy. Overall accountability for ethical conduct lies with **Senior Management**, which is responsible for approving the its labour and human rights policy, ensuring its implementation across all operations, and monitoring performance.

The **Senior Management**, in close collaboration with the **Sustainability, Legal, HR, and Internal Audit departments**, is responsible for:

- overseeing the application of the labour and human rights policy
- monitoring compliance with child labor, forced labor, human trafficking, discrimination and harassment requirements
- coordinating investigations related to reported human rights
- managing the working conditions and ensuring proper follow-up

Line management is responsible for promoting human rights behavior within their teams, ensuring awareness, and enforcing compliance at operational level.

All employees share responsibility for:

- complying with the its labour and human rights policy.
- participating in mandatory career management training
- reporting any suspected violations

Labour and human rights concerns can be reported through a formal **whistleblowing mechanism**, which allows confidential and anonymous reporting. All cases are assessed and investigated by authorized and trained personnel, ensuring independence, objectivity, and protection against retaliation.

This governance structure ensures clear accountability, effective oversight, and alignment of human rights with the Company's overall governance and sustainability framework.



Distribution and Communication

It falls into the responsibilities of Sidenor'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 companies' intranet (or in other internal communication tools) and official corporate websites.

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