

HUMAN RIGHTS POLICY

RESPECT FOR HUMAN RIGHTS

Respect for human rights is a fundamental value of our Group of companies. We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights in our relationships with our employees and suppliers. Our aim is to contribute to a sustainable society.

This Policy is guided by international human rights principles encompassed by The Universal Declaration of Human Rights of the United Nations, the European Convention for the Protection of Human Rights and Fundamental Freedoms and The International Labor Organization's (ILO) Declaration on the four Fundamental Principles and Rights at Work.

This policy applies all entities in which we hold a majority interest and the facilities that we manage. We also expect suppliers to uphold these principles and urge them to adopt similar policies within their own businesses.

We are committed to doing the right thing by respecting human rights in every aspect of our business operations. We embrace this commitment and responsibility of ensuring that human rights are upheld along our whole value chain. We seek to promote access to remediation where we are linked with our stakeholders, our employees, our customers, the communities where we do business and our business partners.

The Human Rights Policy is overseen by the Management Board.

COMMUNITY AND STAKEHOLDER ENGAGEMENT

We recognize that we are part of the communities in which we operate. We engage with stakeholders on human rights matters that are important to them such as land rights, access to water and health. We also engage with people among stakeholders, including indigenous peoples as well as other vulnerable and disadvantaged groups. Our aim is to ensure through dialogue that we are listening to, learning from and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level.

Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business. This includes issues at our Group, across our value chain and with our various sponsorships, through which we seek to promote respect for human rights.

DIVERSITY AND INCLUSION

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected under international or local law. The basis for recruitment, hiring, placement, development, training, compensation and advancement at the group is qualifications, performance, skills and experience.

We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

SAFE AND HEALTHY WORKPLACE

The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace, free safety equipment (where needed) and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

WORKPLACE SECURITY

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

FORCED LABOR AND HUMAN TRAFFICKING

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

CHILD LABOR

We reject all forms of child labor. We do not employ children under the legal age for employment in any country or local jurisdiction for positions in which hazardous work is required.

WORK HOURS, WAGES AND BENEFITS

We compensate employees competitively relative to the industry and local labor market, and in accordance with the terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

LAND RIGHTS AND WATER RESOURCES

We recognize the significant implications regarding respect for human rights that land use and water use across our value chain may have, which we address through specific policy and action.

We respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities. Where and when needed, we are also implementing source water protection plans at our facilities.

GUIDANCE AND REPORTING FOR EMPLOYEES

We strive to create workplaces in which open and honest communication among all employees is valued and respected. The Company is committed to comply with applicable labor and employment laws wherever we operate. The Company ensures employees are aware of the Human Rights Policy through the group-wide communication platform.

Any employee who believes a conflict arises between the policy and the laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns directly to the local management, Human Resources Department, or the Compliance Department. Employees can also report suspected policy violations through a web based Incident Reporting system accessible via all company websites. No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. We will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

The Human Rights Policy is aligned with the Code of Conduct. This policy, including translations and related information, can be found via all company websites.

PUBLIC REPORTING

We report to the public on our human rights-related commitments, efforts and statements, consistent with this Human Rights Policy, as part of our Human Rights Report and annual Sustainability Report. This reporting cross references the UN Guiding Principles Reporting Framework.

MONITORING

We will review the effectiveness of our measures to protect Human Rights on a regular basis as well as occasion-related. Within the company, we will actively involve our employees through regular surveys. In our supply chain, we check the effectiveness of measures through our supplier evaluation and, if necessary, through supplementary supplier audits.