

# Iskraemeco Group Human Rights Policy

## 1. Purpose and Scope

Iskraemeco Group (Iskraemeco Holding Switzerland AG and its subsidiaries) upholds the highest standards of ethical conduct, human rights protection, and compliance with all relevant international and domestic legal frameworks. Our operations, including the global supply chain, are governed by policies that ensure a safe, equitable, and respectful working environment for all stakeholders.

Iskraemeco Group Human Rights Policy (collectively, "Policy") applies to all Iskraemeco Group employees, suppliers, contractors, and business partners globally (collectively, "Subjects"). It is embedded in our Supplier Code of Conduct and Global Supply Agreement and serves as a key element in our due diligence process when evaluating business partners. For more detailed information, visit Iskraemeco Group webpage https://iskraemeco.com/.

#### 2. Compliance with Laws

All Subjects are required to observe all applicable laws, regulations, and internal policies. This includes compliance with both global and local human rights standards and labour laws, ensuring that workers' rights are upheld across all areas of operation. All business activities are conducted in strict accordance with these regulations to ensure that no form of exploitation, abuse, or discrimination occurs. In instances where local laws, regulations. or policies impose stricter requirements than those outlined in this Policy, such local provisions shall take precedence and govern, ensuring full compliance with the higher standard

#### 3. Commitment to Human Rights

As a member of the United Nations Global Compact (UNGC), Iskraemeco Group is committed to upholding human rights as outlined by the UNGC principles and International Labour Organization (ILO) standards. This commitment is reflected in our Code of Business Ethics, which ensures human rights are respected and protected across our organization and supply chain, also reflected in our Supplier Code of Conduct. We explicitly prohibit child labour, forced labour, and any form of modern slavery. Our human rights policies are aligned with both global standards and local legislation, ensuring that we meet or exceed legal and ethical obligations.





We also implement rigorous human rights due diligence processes to identify, assess, and mitigate human rights risks across our operations and supply chain. These processes enable us to proactively prevent, mitigate, and address human rights violations, ensuring that our business practices remain ethical and responsible at all levels.

#### 4. Prohibition of Child Labour and Juvenile Labour

Iskraemeco Group strictly prohibits the employment of underage workers, in alignment with local and global legislation. We do not hire individuals under 18, except in rare cases of regulated educational internships, through partnerships with educational institutions. Any business partner or supplier found using child labour will face immediate corrective actions, including potential suspension or termination of the business relationship. This prohibition is a non-negotiable condition in all business engagements. Iskraemeco Group does not conduct business with companies that fail to comply with these standards or violate other human rights.

# 5. Prohibition of Forced Labour and Modern Slavery

Iskraemeco Group unequivocally opposes all forms of forced labour, including bonded labour, involuntary prison labour, and human trafficking. Any form of coercion, whether through threats, restriction of movement, withholding identity documents, or wage manipulation, is strictly forbidden. All suppliers are required to ensure that their workers are employed freely, without the threat of modern slavery or human trafficking. Regular audits and supplier verifications are conducted to ensure compliance.

#### 6. Working Environment

Iskraemeco Group fosters a professional, accountable, and respectful working environment, free from violence, harassment, and discrimination. Any form of abuse physical, verbal, or psychological—is prohibited. We also prohibit discrimination based on sex, race, skin colour, age, health status, disability, religion, political beliefs, trade union membership, nationality, social background, family status, sexual orientation, or any other personal circumstance. More on this can be found in our Equal treatment policy.

#### 7. Freedom of Association and Collective Bargaining

Iskraemeco Group recognizes and upholds the rights of workers to freely associate, form, and join trade unions, and engage in collective bargaining without fear of retaliation, as outlined in our collective agreement. We expect all our suppliers and business partners to respect these fundamental rights. Any violation of these principles will result in corrective action in line with our global supply agreements and ethical standards.





## 8. Employee Training on Human Rights

We provide annual training for all employees on key human rights and ethics issues, organized by Iskraemeco Group's Compliance department. This training also covers the rights to freedom of association, collective bargaining, and anti-discrimination measures. Employees are equipped with the knowledge to identify and report potential human rights violations through secure, confidential channels. Additionally, upon commencement of employment, each new employee is formally introduced to Iskraemeco Group's core values, policies, and principles, including the established framework for addressing violations and managing incidents related to the breach of these standards. This onboarding process ensures that all employees are fully informed of their responsibilities and the mechanisms in place for reporting and handling any infractions.

Target: Achieve at least 95% employee participation in training programs, including modules on human rights by 2030.

# 9. Health and Safety at Work

The health and safety of our workforce is a top priority at Iskraemeco. All employees comply with relevant health and safety regulations, and we enforce a preventive and proactive approach to mitigating workplace hazards, as described in our Health and Safety Policy. We require our suppliers to maintain similar standards, ensuring that working conditions across the supply chain are safe, secure, and compliant with legal health and safety obligations, as described in our Supplier Code of Conduct and Global Supply Agreement.

#### 10. Fair Pay and Working Conditions

Iskraemeco Group ensures that all employees receive fair and competitive compensation in line with local laws and industry standards. This includes compliance with working hours, overtime regulations, and provisions for paid leave. We also require suppliers to provide their workers with fair remuneration and safe working conditions, and we regularly audit supplier compliance with these obligations.

# 11. Rights of Migrant Workers

Migrant workers employed at Iskraemeco Group and across our supply chain are treated fairly, with full access to legal contracts, fair pay, and appropriate living conditions. We do not tolerate any form of exploitation, such as withholding identity documents or manipulating wages. Suppliers must ensure that migrant workers' rights are fully respected and that they are not subjected to discrimination or abuse.





# 12. Access to a Healthy Environment

Iskraemeco Group recognizes the right of workers to a healthy and safe environment. We actively seek to reduce our environmental impact by implementing measures to minimize waste, emissions, and energy consumption. Our Environmental and Energy Policy, along with our Sustainability Policy, further detail our approach and commitment to preserving the climate and environment. Our suppliers are also required to uphold high environmental standards, ensuring that workers are not exposed to unsafe environmental conditions in the workplace.

#### 13. Supplier Audit Programme

Iskraemeco Group conducts thorough audits of suppliers to verify their compliance with our human rights standards. Audits include assessments of working conditions, health and safety practices, fair pay, and the prohibition of forced and child labour. Suppliers found to be non-compliant are required to take immediate corrective action. Failure to comply will result in suspension, termination, or disgualification from future business engagements in line with our Global Supply Agreement. We provide detailed reporting on the number. scope, and types of audits conducted in our annual Sustainability Reports, ensuring transparency and accountability in our supply chain oversight.

Target: Aiming for 0 human rights incidents throughout the value chain.

# 14. Whistleblowing Hotline

Any breach of this Policy constitutes misconduct and may result in disciplinary actions or legal liability under applicable labor laws.

Employees are often the first to identify potential violations or omissions related to this Policy. Iskraemeco Group commits to maintaining the confidentiality of any concerns raised regarding the enforcement of this Policy (provided the reported violation is not attributable to the reporting employee) and guarantees that individuals who report concerns will not face any negative repercussions as a result of their report. Allegations of violence, harassment, or mobbing will also be handled with strict confidentiality.

Iskraemeco Group provides a secure, anonymous whistleblowing hotline for employees and suppliers to report human rights violations, unethical behaviour, or breaches of our human rights policy. All reports are treated confidentially, and there is a zero-tolerance policy for retaliation. Violations of this Policy may be reported, either anonymously or with identification, via email at: prijavakodeks@iskraemeco.com. Each report is thoroughly investigated, and incidents are transparently documented in our ESG/sustainability reports.





# 15. Reporting and Transparency

As previously mentioned, Iskraemeco Group regularly publishes data and information about our human rights initiatives, risk assessments, and incident responses in our annual sustainability report and our contributions to the United Nations Global Compact (UNGC). While no human rights violations have been reported within Iskraemeco Group to date, we remain vigilant and transparent in monitoring compliance.

# 16. Supplier Code of Conduct and Due Diligence

Iskraemeco Group's human rights principles are embedded in our Supplier Code of Conduct and Global Supply Agreement. We conduct extensive due diligence on new suppliers to ensure compliance with human rights standards, and we maintain strict oversight of our supply chain to mitigate any potential risks. Any suppliers that fail to meet these standards may face suspension, corrective actions, or termination of their business relationship.

## 17. Continuous Improvement

Iskraemeco Group is committed to continuous improvement in our human rights practices. This Policy is subject to a formal review every three years. The revision process involves collaboration across multiple Iskraemeco Group departments, each providing input to ensure the Policy remains comprehensive, up-to-date, and reflective of best practices. This multidisciplinary approach guarantees that the Policy continues to meet the highest standards of quality and addresses all relevant legal, ethical, and operational considerations.

All employees, suppliers, and business partners are expected to uphold the principles outlined in this policy to foster a fair, safe, and ethical working environment for all.

In Kranj, on 18.09.2024

Iskraemeco Holding Switzerland AG.

Iskraemeco Holding Switzerland AG,

Thomas Petuaud-Letang, BOD member

Bahaaeldin Abdallah, BOD member



