

Labor and Human Rights Policy

Policy statement and scope

Stalatube is committed to supporting and promoting labor and human rights in every aspect of our operations. We recognize that respect for these rights is a fundamental requirement for sustainable development and responsible business conduct. This policy applies to Stalatube and all its subsidiaries, and we expect our partners throughout our entire value chain to uphold the same standards.

Stalatube commits to and is adhering to the following legal and regulatory frameworks:

- ILO Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights (UNGPR)
- UN Universal Declaration of Human Rights
- OECD Guidelines for Multinational Enterprises
- Applicable national legislation in countries of operation

Furthermore, our participation in the United Nations Global Compact reflects our ongoing commitment to conducting business in a manner that is ethical, sustainable, and environmentally responsible, with particular attention to the principles of labour and human rights, environment, and anti-corruption.

This policy applies to all employees, agency workers, contractors, suppliers, and partners in all regions where we operate. We expect our suppliers and partners to uphold similar human rights standards and commit to fair and ethical practices in their operations as we do.

This policy is part of Stalatube's wider commitment to sustainability. The policy is supported and complemented by other company policies and internal guidelines, including HR, data protection, occupational health and safety, whistleblowing and procurement policies, as well as detailed implementation guidelines. These documents provide detailed guidance on implementing human rights principles in daily operations. We set and regularly review measurable targets to monitor the effectiveness of these policies.

Commitments and principles

Respect and Dignity

We are committed to maintaining a workplace where all individuals are treated with respect, dignity, and fairness. Discrimination, harassment, or abusive conduct based on race, gender, nationality, religion, disability, age, or any other personal characteristic will not be tolerated. We expect all employees, at every level, to contribute to a culture that promotes open communication, inclusivity, mutual respect, and equal opportunity. Diverse perspectives are valued and everyone is empowered to contribute to their fullest potential.

Safe and Healthy Work Environment

Safety is at the core of our daily operations. We have a strong preventive safety culture, and we guarantee a safe, healthy, and supportive work environment for all employees, contractors and agency workers. We are committed to achieving an accident-free work environment. We comply with all applicable health and safety laws and implement proactive measures to prevent workplace injuries, illnesses, and hazards. Everyone has the right to work in conditions that protect their

physical and mental well-being. We ensure that all employees have access to a work environment free from violence, harassment, and unsafe conditions. Through training, risk assessments, and a culture of safety, we empower all employees to take an active role in maintaining a secure and respectful workplace. All employees are encouraged to make safety observations and initiatives to improve our preventive safety culture continuously.

Diversity, Equity and Inclusion

We are committed to fostering a diverse, equitable, and inclusive workplace where everyone is valued, respected, and empowered to thrive. We embrace differences in background, identity, experience, and thought, and we actively work to eliminate barriers to equal opportunity. We aim to build a culture of belonging and full participation through inclusive hiring, fair policies, good working conditions, and continuous education.

Fair Labor Practices

We are committed to upholding fair labor practices in all aspects of our operations and supply chain, including prohibition of child labor, human trafficking, forced labor, bonded labor, slavery or any form of modern slavery. We follow the minimum working age requirement which is aligned with ILO conventions, and protect young workers (for those above minimum age but under 18). We prohibit practices such as limiting employees' mobility, imposing unreasonable recruitment fees, seizing identity documents, or withholding pay.

Wages, working hours, over time, absences and benefits will meet or exceed legal and industry standards, ensuring that all employees are treated fairly, ethically and with integrity. We ensure equitable pay for all employees by regularly reviewing compensation practices for gender and pay gaps. One of our most important targets included in our management system is to ensure that we have zero pay gap in women's salaries. We report the results of our annual equal pay analysis in our sustainability figures. Our target is also to conduct annual reviews of wage levels to ensure they keep pace with inflation, cost-of-living changes, and market trends, with a commitment to adjusting wages accordingly. We will strive to reduce wage disparity by promoting fair compensation practices and supporting employees' financial well-being across all levels of the organization.

Career Management and Training

We are committed to supporting the professional growth and development of our employees through fair access to training, upskilling, and career advancement opportunities. All employees are encouraged to take part in learning programs that enhance their skills, performance, and long-term career potential. We ensure training is inclusive, relevant, and accessible, and we promote talent development as part of our commitment to decent work and equal opportunity for all.

Protection of Social Dialogue

We are committed to fostering and protecting social dialogue as a fundamental component of fair labour practices. Employees have rights to freely associate, join trade unions, engage in collective bargaining, and participate in open, constructive discussions with management.

Community Engagement and Indigenous Rights

We commit to respecting the rights and cultures of the communities where we operate. We will engage respectfully and transparently with local communities and seek their input in decisions that may affect them.

Implementation, Accountability and Due Diligence

We ensure the systematic implementation of this policy across all operations. This includes embedding labour and human rights considerations into strategic planning, operational procedures, supply chain management, and business

relationships. Implementation measures consist of mandatory training programs, clear expectations for suppliers and partners, and regular policy reviews to ensure continuous improvement.

Our top management is committed to respect labour and human rights. This policy is accepted by our Board of Directors. Senior management is accountable for ensuring its effective execution, while all managers are responsible for integrating the policy principles into their respective areas of responsibility. Employees are expected to comply fully with this policy, and breaches may result in disciplinary action.

We shall conduct ongoing human rights due diligence in alignment with the United Nations Guiding Principles on Business and Human Rights. We are committed to implementing human rights due diligence processes to identify, prevent, mitigate, and account for how we address adverse human rights impacts in our operations and throughout our value chain. This includes:

- Assessing potential and actual human rights risks and impacts, and reviewing assessments regularly
- Integrating assessment findings into decision-making processes
- Monitoring and tracking the effectiveness of responses
- Communicating transparently with stakeholders regarding identified risks and the measures taken to address them
- Where adverse impacts are identified, We shall act to prevent, mitigate, and, where appropriate, remediate such impacts.

Grievance Mechanisms

We provide confidential reporting channels for our employees and external stakeholders for reporting compliance concerns or legal issues. All reports are handled with strict confidentiality and investigated thoroughly. We are committed to ensuring that whistleblowers are fully protected against retaliation in accordance with applicable legislation. When human rights violations or concerns are identified through our reporting channels or due diligence processes, we commit to:

- Promptly investigating the matter
- Taking immediate action to stop ongoing violations
- Implementing preventive and corrective measures and actions to prevent recurrence
- Providing or cooperating in remediation for affected parties
- Reviewing and updating our processes to address systemic issues

Our whistleblowing channel can be found on our website. The channel is accessible to all employees and external stakeholders. This channel enables employees and other stakeholders to report any observed or suspected misconduct or activity that violates European Union or national legislation, United Nations Guiding Principles on Business and Human Rights, our Code of Conduct, or our other policies or values. Reports should be submitted without delay if there is suspicion of unlawful activity, misconduct, or any action contrary to the public interest. Reports may be made anonymously,

Our internal, employee reporting channel, SpeakUp can be found on our intranet. SpeakUp provides employees with the opportunity to report employment-related concerns anonymously. Everyone has both the right and the obligation to intervene in any inappropriate conduct, bullying, harassment, or discrimination they observe.

In addition to the Whistleblowing and SpeakUp channels, employees may contact their line manager or HR directly to raise concerns.

Policy Review

This Policy has been approved by the Board of Directors of Stalatube on behalf of the entire group. The Executive Management Team is responsible for the implementation of this policy, with oversight from the Board of Directors.

This policy will be reviewed and revised at least annually or more often if needed to ensure it reflects current best practices and legal standards, and continues to meet the needs of Stalatube.