

## HUMAN RIGHTS POLICY

Recom Technologies companies including holdings, subsidiaries, and affiliated companies ("Recom Technologies") respects all internationally recognized human rights and is bound by several international treaties including, but not limited to, those covered under the United Nations ('UN') Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, Political Rights and the International Covenant on Economic, Social and Cultural Rights, the International Labour Organization's Declaration ('ILO') on Fundamental rights at work and other relevant Conventions, the Voluntary Principles on Security and Human Rights ('VPSHR') and international humanitarian law, where applicable.

Recom Technologies is committed to prevent causing or contributing to adverse human rights impacts, ensuring we are not complicit in their violations by implementing ongoing processes that aim to prevent, avoid, mitigate, and remedy human rights impacts we could impose on our employees, contractors, workers within our value chain, members of communities where we operate, and any other people whose human rights may be adversely impacted by our business activities.

To meet this commitment Recom Technologies will:

- Foster an equitable, diverse and inclusive workplace, including providing equal remuneration for male and female employees for work of equal value in equivalent jurisdictions.
- Ensure fair, supportive, inclusive, and equal treatment of all employees, promoting an environment where people with diverse experiences and perspectives can develop and fulfil their potential, free from abuse, harassment, violence, and discrimination in respect of employment and occupation.
- Prevent harassment by treating all employees with dignity and respect at all times. Any type of harassment, including physical, sexual, verbal or other, is prohibited and can result in disciplinary action up to, and including, contract termination.
- Comply with all laws regarding employment conditions including basic and overtime working hours and will abide by agreements negotiated with our employee representatives. Recom Technologies will pay competitive wages based on local market assessments, at, or above the minimum living wage.
- Communicate our expectations that suppliers have processes that respect human rights, and that they remedy their offending practice or policy if they are in violation of those rights. We do not tolerate the use of forced labour, child labour or human trafficking of any kind in our operations or supply chain.
- Put special emphasis on the rights of disadvantaged groups that may be impacted by our activities, including Indigenous People, women and children.
- Seek independent verification on our human rights due diligence activities at least once annually.
- Collaborate and establish adequate measures to eradicate all forms of modern slavery. We do not tolerate child labour, any form of forced, compulsory, or bonded labour, human trafficking, or any other form of modern slavery within our own operations, value chains, or investments.
- Promote a safe and healthy working environment and positive safety culture. Our commitment is to work towards a goal of zero accidents, injuries, and the general wellbeing in the workplace.
- Conduct on-going human rights due diligence, including human rights risk assessments at our operations and in our supply chain.

## Grievance Mechanism

At Recom Technologies we strongly support a culture of speaking up. We encourage all employees to ask questions and raise issues without fear of retaliation and commit to treating reports seriously and



investigating them thoroughly for reported suspected unethical, illegal or suspicious behavior. Recom Technologies does not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit.

Employees, business partners, and all other stakeholders can report violations of regulation of human rights or indicate their suspicion. Reports are accepted by email at <u>ethics-humanrights@recomtech.com</u>.

Cases are investigated and, where breaches are found, appropriate actions and effective remedy are taken.

Recom Technologies has also put in place specific processes to address the grievances related to raw materials brought to our knowledge. There is no retaliation against anyone who reports a genuine concern and Recom Technologies has a zero tolerance on attacks on defenders of Human Rights.

RECOM TECHNOLOGIES Revised in December 2022