

LABOUR RIGHTS POLICY

Policy Statement

This policy sets out the commitment of Recom Technologies companies including subsidiaries, affiliates, and holding companies ("Recom Technologies"), to ensure that it maintains at least the minimum labour standards at all times.

Minimum Standard

The following minimum labour standards have been devised by reference to the UN Universal Declaration on Human Rights.

No Forced Labour

Recom Technologies shall ensure that there will be no forced, bonded or involuntary prison labour. Employees will not be required to lodge "deposits" or their identity papers and are free to leave in accordance with the terms set out in their contract.

Freedom of Association and Collective Bargaining

Recom Technologies recognizes and respects the right of employees to exercise their right of freedom association, as per applicable legislation. It is followed that Recom Technologies respects the rights of their employees to choose or not choose collective bargaining.

Child Labour

According to the ILO, "child labor" is defined as work that "deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development". Recom Technologies will never employ individuals in violation of the local mandatory school age or who have not reached legal employment age in the respective countries where they operate. Moreover, in no case will Recom Technologies or its suppliers employ workers under the age of 15.

Working hours

Recom Technologies shall comply with national laws, collective bargaining agreements (where applicable), and benchmark industry standards on working hours, overtime, breaks, and public holidays. The normal working week, not including overtime, shall be defined by any applicable legislation but shall not exceed 40 hours. All overtime work is voluntary and will not exceed 12 hours per week, unless there is a short-term business need and all parties agree with the terms.

In any event, employees will not, on a regular basis, be required to work in excess of 40 hours per week and will have at least one day off for every 7-day period on average. Overtime is voluntary and additional payment will be made.

Remuneration

Recom Technologies shall ensure that wages for a normal week, not including overtime, shall always meet at least legal or industry minimum standards and are sufficient to meet the basic needs of staff. Recom Technologies shall not make deductions from wages for disciplinary purposes.

All overtime is reimbursed at a premium rate, as defined by national law.

Recom Technologies shall ensure that personnel's wages and benefits are clearly and separately detailed in writing for each pay period. Personnel will be paid all wages and benefits in a manner convenient to them and not in delayed or restricted forms.

Retirement

Recom Technologies is committed to:

- Guarantee competitive pension schemes;
- Provide medical insurance and care for both employees and retirees;
- Provide coverage of heavy and long-term disease.

Personal Data Protection

Recom Technologies is committed to:

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- Responsibly, reasonably, and transparently collect, use, and disclose personal data (any information that relates to an individual who can be directly or indirectly identified) of employees, in line with the applicable laws, standards and rrules or regulations;
- Process data for the legitimate purposes specified explicitly to the data subject when collected by Recom Technologies;
- Collect and process only as much data as necessary for the purposes specified. Personal data is mainly used for human resources, IT, occupational health & safety, labour relations, management and audits;
- Keep personal data accurate and up to date;
- Store personally identifying data for as long as necessary for the specified purpose;
- Undertake reasonable organizational, technical, and administrative measures to protect personal data under its control;
- Allow employees to exercise rights under applicable data protection laws such as the right to be informed, the right to access, the right to rectification, the right to erasure, the right to restrict processing, the right to data portability, the right to object;

No Discrimination

Recom Technologies will never discriminate in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Safe Work Environment

Recom Technologies will provide a safe and hygienic working environment and adequate steps will be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working

Employees shall receive regular and recorded health and safety training, and such training will be repeated for new or reassigned workers.

Access to clean facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

A senior manager will be responsible for health and safety.

Due Diligence and Disciplinary Measures

This policy commitment to respect human rights and labour rights is integrated into our governance frameworks, management systems, investment beliefs, policies and strategy.

Our business partners in the supply chain are expected to also seek to uphold human rights and labour rights in their business practices. Violations of this policy may lead to disciplinary action up to, and including, termination of partnership.

Grievance Practices

Recom Technologies is committed to treating all employees with dignity and respect. We have established channels where all employees can give feedback through the regular direct management and human resources channels.

Recom Technologies is committed to involving stakeholders in the grievance process and remediating where appropriate. We encourage employees to speak up whenever they have a complaint or concern about unjust, unfair or disrespectful treatment, harassment, or a health and safety issue in the workplace. We have a 'no retaliation' policy to reassure employees that there will be no adverse consequences for reporting concerns in good faith.

> **RECOM TECHNOLOGIES** Revised on December 2022

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