

HUMAN AND LABOUR RIGHTS POLICY

PANKAS GROUP



Introduction and purpose

The Pankas Group is committed to respecting and promoting human rights in all our activities and business relationships. This policy outlines our approach to human rights and our commitments to employees, suppliers, customers, and other stakeholders.

Pankas Group acknowledges and adheres to internationally recognized standards for responsible business conduct, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. These frameworks form the foundation of this Human and Labour Rights Policy and reflect our commitment to acting responsibly in all areas of our operations and value chain.

Our approach to human rights is guided by a set of core principles. We are committed to respecting and promoting diversity and equality, ensuring that all individuals are treated fairly and without discrimination. We strictly prohibit all forms of harassment, forced labour, and involuntary work, and we uphold a zero-tolerance stance toward child labour. We also recognize and support the right to freedom of association and collective bargaining as a fundamental worker right. Finally, we place strong emphasis on providing and maintaining a safe and healthy working environment for all individuals impacted by our business activities.

Scope and application of the policy

This policy applies to all employees in our subsidiaries, as well as to workers in our value chain and to other individuals we engage with.

The policy covers the following areas:

- Diversity and equality
- Harassment and forced labour
- Child labour
- Freedom of association
- A safe and healthy working environment

Our commitment to fundamental human rights

Pankas Group is committed to upholding the fundamental rights of all individuals affected by our operations. This commitment is embedded in how we manage our workforce and engage with partners across our value chain. The following areas are key pillars of our human rights approach:

We promote **diversity and equal opportunity** by ensuring that employment decisions are based solely on objective criteria such as qualifications, experience, and merit. Discrimination of any kind is not tolerated, and all employees are to be treated with fairness, dignity, and respect.

We reject all forms of **harassment, forced labour, and involuntary work**. No one should be subjected to threats, coercion, or degrading treatment in the workplace. Pankas Group strives to maintain a working environment that is professional, inclusive, and free from any form of intimidation, harassment, or abuse.

We maintain **zero tolerance for child labour**. All employees must be at least 15 years old or older if required by local law, and must have completed their compulsory schooling, in accordance with international standards and local laws.

We respect the right to **freedom of association and collective bargaining**. Employees must be free to join or form unions and to negotiate collectively without interference or fear of retaliation. We support constructive dialogue between management and employee representatives.

A **safe and healthy working environment** is fundamental to our operations. Our subsidiaries are required to establish a strong safety culture, supported by practices that protect the physical and mental well-being of all employees. Preventive measures, training, and risk assessments must be in place to uphold the highest standards of occupational health and safety.

Implementation and monitoring

To ensure that the principles outlined in this Human and Labour Rights Policy are effectively embedded across our organization, Pankas Group has established clear procedures for implementation and oversight.

All subsidiaries are required to integrate this policy into their daily operations. This includes communicating relevant policies to new employees as part of the onboarding process, and conducting regular training on key human rights topics to maintain awareness and ensure ongoing compliance.

We actively monitor the implementation efforts of our subsidiaries and evaluate their progress. As part of our corporate responsibility, we report annually on these efforts in our consolidated annual report, in line with the requirements set out in the Corporate Sustainability Reporting Directive (CSRD).

Complaints and enforcement

Pankas promotes ethical behavior in all business relationships. Our whistleblower program allows employees, supplier representatives and other individuals not directly employed by Pankas to report illegal or unethical practices and violations of this Human and Labour Rights Policy.

Concerns can be reported at www.pankas.com or on relevant company's local website. All reports made in good faith will be investigated. Pankas ensures anonymity and confidentiality for everyone involved in the investigation and guarantees protection against retaliation.

Sanctions for non-compliance with the policy will be enforced.

Audit and update

This Human and Labour Rights Policy is reviewed at least every three years or as needed to ensure ongoing relevance and regulatory compliance.