



LABOUR & HUMAN RIGHTS POLICY

Last revision date: January 2024



INTRODUCTION

We believe meaningful, sustainable employment has the power to change the world. For more than 16 years, we've been connecting thousands of people to work and helping them develop skills to stay employable for the long term. This way they can support their families, contribute to their communities and achieve their career goals. By respecting and promoting proclaimed human rights, we can ensure that work is a source of dignity and purpose – as well as income – for the people we employ.

ESSA SALES & DISTRIBUTION respect internationally recognized human rights as expressed in the International Bill of Human Rights, consisting of the Universal Declaration on Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social & Cultural Rights and the principles and rights set out in the eight International Labour Organization Core Conventions.

The purpose of this policy is to define the labor and human rights standards to which all employees in the **ESSA SALES & DISTRIBUTION** are entitled, irrespective of the country in which they work.

SCOPE

This Policy shall be enforced in all wholly owned and/or controlled **ESSA SALES & DISTRIBUTION** operations, including – but not limited to - industrial facilities, elevators, warehouses, offices. This Policy will be updated regularly, where possible, by engagement with internal and external stakeholders. It will be actively communicated and promoted ensuring its compliance. We expect our contractors and any other third party working on our behalf to uphold the standards within this Policy.

REQUIREMENTS

We are committed to conducting our business activities based on respecting the following human and labor rights:

1. NON-DISCRIMINATION

- 1.1 **ESSA SALES & DISTRIBUTION** does not tolerate any form of discrimination against our employees based on race, color, gender, language, religion, political or other opinions, national or social origin, property birth, sexual orientation, age, disability, or other distinguishing characteristics.
- 1.2. Any employment-related decisions, from hiring to termination and retirement, must be based solely on lawful, non-discriminatory criteria.

2. FORCED LABOUR

- 2.1 Our company does not tolerate any form of forced labor including bonded labor, indentured labor and slave labor, or human trafficking. Workers must be allowed to move around freely and leave their place of work when their working hours end.

3. CHILD LABOUR

3.1 ESSA SALES & DISTRIBUTION does not tolerate the hiring of child labor under any circumstances. The minimum age for full-time employment must be 16, according to the Romanian national work legislation, and only activities appropriate to their physical development, skills, and knowledge. Our company does not hire employees under the age of 18 for positions requiring hazardous work that could jeopardize the health, safety, or morals.

4. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

4.1 We respect employees' rights to form, join or not join a labor union, or other organization of their choice, and to bargain collectively in support of their mutual interests without fear of punitive actions such as intimidation, harassment, or termination of employment.

5. HARASSMENT

5.1. ESSA SALES & DISTRIBUTION protect workers from any acts of physical, verbal, sexual, or psychological harassment, bullying, abuse, or threats in the workplace by either their fellow employees or managers.

6. WORKING HOURS, BENEFITS, AND WAGES

6.1. Our company adheres to the stricter Romanian national applicable law standards, relating to minimum wages, working hours, overtime, and benefits. We provide fair and competitive compensation commensurate with the employees' position;

6.2. Employees must not be required to work more than 48 hours a week, including overtime, regularly.

6.3. Wages for overtime must be paid in a legal tender regularly. Wage deductions as a disciplinary measure must not be permitted unless provided for by national law. Employees must be given reasonable breaks while working and sufficient rest periods between shifts.

6.4. ESSA SALES & DISTRIBUTION is committed to continuously developing employee skills and capabilities, and to providing opportunities for career advancement.

7. EMPLOYEE CONTRACTS

7.1 All employees must be provided with a written, understandable, and legally employment contract.



ROLES AND RESPONSIBILITIES

Body/function/individuals	Roles and responsibilities
Executive Committee	Responsible for policy approval.
HR Director of ESSA Sales & Distribution SA	Owens endorses and ensures the implementation of the policy.
Regional and local management	Responsible for ensuring that this policy and related standards are implemented and adhered to and that all relevant employees are made aware of the policy and its requirements. Ensure local compliance with the policy including adequate control measures to eliminate or reduce risks to express behaviors in breach with the policy.
HR Managers	Drives the implementation of the policy, provides specific advice on labor and human rights issues and dilemmas, and ensures that labor and human rights issues are identified and addressed. Audits, reviews, measures, and reports on labor and human rights performance.
Management, employees, and contract workers of all entities in ESSA Sales & Distribution SA	Responsible for adhering to this policy. Comply with the letter and spirit of the policy. Engage and take responsibility for ensuring that all initiatives are developed in line with the policy.

DEVIATIONS

No exemptions from this policy can be granted unless there are exceptional circumstances or the policy is obviously not applicable. All requests for exemptions must be made in writing to the policy owner. The policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented.

POLICY REVISION

This policy must be regularly reviewed in order to ensure its continued adequacy and relevance. It may be amended at any time with the approval of ExCom.

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