



**CENTRAL FUNCTION HUMAN RESOURCES**

**Human Rights Policy**

<b>Developed by</b>	Theodoros Katsikis (People Experience & Intelligence Director)
<b>Reviewed by</b>	Sara Fideli (Chief People Officer)
<b>Management Approval</b>	Internal Consultation Process
<b>Recommendation</b>	Sara Fideli (Chief People Officer) Sustainable Development Committee Remuneration and Nominations Committee
<b>Approved by</b>	Board of Directors

April 2025

REVISION HISTORY		
Revision Number	Approval Date	Amendments' Description
1.0	28/01/21	Policy Implementation launch
2.0	23/04/25	A) Review based on best international practices in the field of Human Rights, taking into account a wider range of international standards and guidelines. B) Policy review and approval roles.

# Table of Contents

- 1. Introduction ..... 4
- 2. Purpose & Scope..... 4
- 3. Standards & Guidelines ..... 4
- 4. Integration into Business Activities..... 5
- 5. Roles & Responsibilities ..... 5
- 6. Vision & Commitments ..... 6
- 7. Transparency & Communication ..... 9
- 8. Reporting of Policy Violations..... 9
- 9. Review & Approval ..... 10

## **1. Introduction**

METLEN Energy & Metals S.A. (METLEN) is committed to respecting and safeguarding all Human Rights, particularly those that fall within the scope of its business activities. Through the Human Rights Policy (Policy), the Company affirms its dedication to upholding and promoting the fundamental rights and dignity of all individuals, both within the organization and across its broader sphere of influence.

Respect for Human Rights is provided for in a wide range of Company documents including the Company's Code of Business Conduct and the Suppliers and Business Partners Code of Conduct, as it is considered to be one of the Company's fundamental responsible practices with regards to both its employees and its supply chains. Partners Code of Conduct.

## **2. Purpose & Scope**

This Policy embodies the company's zero-tolerance approach to any violation of human rights. It is implemented in the form of non-participation (direct, passive or silent) in such violations, as well as through the avoidance of any transaction and contact with third parties that may have caused or are reasonably suspected to have been involved in creating conditions that encourage violations of said rights.

Moreover, the purpose of the Policy is to raise awareness and ensure the commitment of all METLEN employees, suppliers and business partners in respecting and protecting Human Rights, in all business activities, including its subsidiaries. At the same time, the Policy aims to enable stakeholders to understand the company's alignment with international and European standards, guidelines and Conventions on human rights.

This Policy applies across all business sectors, central functions and subsidiaries of METLEN, regardless of geographical location. Local adaptations may be made to cater to country-specific requirements, if and when deemed necessary.

## **3. Standards & Guidelines**

The Policy addresses significant issues arising from the entire spectrum of Human Rights that fall within the scope of its business activities, the impacts of which (either positive or negative) have been assessed through a specialized self-assessment process carried out in all Business Sectors, Business Units, General Divisions and countries of operation of the Company, based on the international methodology offered by the "UN Global Compact Self-Assessment Tool".

In order to draft this Policy, internationally recognised standards and guidelines have been taken into account. Namely:

- The International Bill of Human Rights, including the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
- The ILO's Fundamental Conventions.
- The 10 Principles of the UN Global Compact
- The Global Sustainable Development Goals (2030 Agenda)
- The UN Guiding Principles on Business and Human Rights
- The Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct

## **HUMAN RESOURCES DE&I POLICY**

- The UN Convention on the Elimination of All Forms of Discrimination against Women (Article 11 - scope of employment)
- the UN Convention on the Rights of Persons with Disabilities
- UNICEF's Children's Rights and Business Principles
- The UN Declaration on the Rights of Indigenous Peoples
- ILO Convention 169 on Indigenous and Tribal Peoples
- ILO Convention 187 on the Promotional Framework for Occupational Safety and Health
- ILO Convention 190 on the elimination of Violence and Harassment in the World of Work.

### **4. Integration into Business Activities**

The main objective of the Human Rights Policy is to contribute to METLEN's overall Sustainable Development Strategy, through its connection with processes and policies that govern the Company's broader business activities.

These include:

- policies and procedures related to human rights and working conditions (diversity, equal opportunities and inclusion, combating violence and harassment in the workplace, recruitment and selection, learning and development, etc.)
- policies and codes of conduct related to the management of relations with suppliers, such as the Responsible Supply Chain Policy and the Code of Conduct
- the due diligence process in mergers and acquisitions
- actions to identify the general situation and position of a country in which the Company intends to operate by undertaking new projects where human rights may be threatened, taking into account internationally accepted rankings (Index/Registry) on the human rights situation in specific geographical areas
- the process of implementing new investments (notification and consent is required before approving any project that may affect the rights of local communities)
- preparing for compliance with the sustainable development (ESG) criteria set by international corporate performance rating agencies (S&P, MSCI, ISS, etc.), financial institutions and investment organizations (EBRD, World Bank, etc.), international sectoral sustainability standards in which the Company voluntarily participates (ASI, GRI, SASB, etc.), as well as business partners (suppliers and customers) that incorporate specific ESG criteria in their partnership evaluation processes.
- the Company's annual social investment plan (in light of Global Sustainable Development Goals 5 & 10)
- mechanisms for privacy and data protection in all digital transformation initiatives
- measures to protect human rights in activities and initiatives aimed at "greening" the Company's operations, ensuring that the green transition is carried out with respect for the rights of all stakeholders.

### **5. Roles & Responsibilities**

The Human Resources Central Function, in cooperation with the other Central

**HUMAN RESOURCES  
DE&I POLICY**

Functions (CFs), the Business Sectors (BS) and Subsidiaries, is responsible for the relevant employee training and the full implementation of the Policy, ensuring the harmonization of all METLEN employees and partners with the values embodied in this Policy.

## **6. Vision & Commitments**

METLEN is committed to:

- raising awareness regarding Human Rights among its employees through the provision of information and training, while conducting corporate activities in a way that showcases respect for Human Rights in practice.
- promoting the respect and protection of Human Rights in its supply chains, through the Suppliers and Business Partners Code of Conduct, the Responsible Supply Chain Policy as well as the inclusion of Human Rights-related ESG criteria for selecting suppliers, both in contractual terms and in the inspections and on-site audits conducted, either by the Procurement departments of its Business Sectors or by qualified external third-party auditors.
- evaluating, on a regular basis, its Business Sectors, Units and General Divisions in all countries of operation in relation to Human Rights considerations, applying the UN Global Compact Self-Assessment Tool (Human Rights section), as well as proceeding with the publication of the relevant findings in METLEN's annual "Sustainable Development and ESG Report".
- being informed about the general situation and the position of the countries in which it operates with regards to the protection of Human Rights. In countries where human rights violations are proven to be systematic, METLEN is committed to taking all measures required in order to avoid any involvement in such violations, as well as any type of business profit that may result from such abusive actions.
- reporting, on an annual basis, the number of work-related incidents and/or complaints and severe human rights impacts within its own workforce, and any related material fines, sanctions or compensation for the reporting period.
- seeking to respect the human rights of all stakeholders engaged, for example, their rights to privacy, freedom of expression, and peaceful assembly and protest.
- receiving employee feedback through Engagement Surveys and Pulse Surveys regarding their views on the status of human rights in the workplace

METLEN's commitments span a wide range of Human Rights considerations, and specifically:

- **Occupational Health & Safety**

METLEN recognizes its responsibility for the continuous improvement of Health & Safety conditions in its workplaces, as well as the right of its employees and the employees of independent business partners and contractors performing work on its premises to work without being exposed to risks that could cause accident, injury or occupational disease, as reflected in the Company's "Suppliers & Business Partners Code of Conduct". The Company focuses on prevention, adopts high standards of health and safety, assesses and manages relevant risks in a systematic manner, while supporting and consistently fostering a corporate culture where health and safety at work are promoted as top priorities. Through its specialized Occupational Health & Safety Policy, the Company is committed to

**HUMAN RESOURCES  
DE&I POLICY**

achieving the goal of “No Accident & No Occupational Disease at Work” which constitutes a core challenge in the industrial sector.

- **Working Conditions**

METLEN is committed to maintaining a work environment based on trust, dialogue and mutual respect, while protecting the well-being and the work-life balance of its employees.

The Company is committed to ensuring adequate/ living wages and reasonable working time, based on applicable laws and industry standards regarding work schedule, overtime and leave for all employees. Moreover, overtime pay exceeds the Greek law provisions.

- **Child Labour**

METLEN is committed to operating in accordance with all laws concerning the minimum age for hiring employees, in all countries where it operates. The Company prohibits the employment of minors under the age of 18.

METLEN voluntarily commits and complies with the 5th Principle of the United Nations Global Compact, which is based on zero tolerance of child labour incidents and circumstances in both its own operations and its supply chains, and consequently in its entire range of activities.

- **Forced Labour and Human Trafficking**

METLEN is committed to taking all measures required in order to avoid incidents and any direct or indirect involvement in any form of forced or compulsory labour and trafficking of human beings (Modern Slavery). At the same time, the Company recognizes its responsibility to remain aware of any relevant risks within the scope of its activities, as well as in its wider supply chain.

The exploitation of any person as well as the implementation of any form of forced or compulsory labour is prohibited for the Company, in accordance with its Code of Business Conduct, the Suppliers/ Business Partners Code of Conduct and the 4th Principle of the UN Global Compact.

The Company demonstrates a zero-tolerance stance with regards to incidents and circumstances that may favour any form of Modern Slavery within the framework of its operations, as well as the activities of its supply chain, recognizing that no area of activity may be excluded.

- **Equal Opportunities, without Discrimination**

METLEN is committed to offering equal opportunities to all employees, while prohibiting discrimination and harassment. Corporate procedures for attracting and recruiting employees, access to learning and development, rewards, performance appraisal and termination of cooperation, are free from discrimination based on personal characteristics such as race, colour, sex, sexual orientation, gender identity, ethnicity, indigeneity, religious or other beliefs, disability or chronic illness, neurodiversity, marital or socioeconomic status, age, political opinion, as also stipulated in the Company’s Diversity, Equity and Inclusion Policy.

The Company does not tolerate any kind of offensive or inappropriate behaviour, unfair treatment or retaliation. According to its Code of Business Conduct, physical or verbal harassment of a sexual, racist or slanderous nature is prohibited in the workplace but also under any circumstances related to work outside the workplace. The Suppliers/ Business Partners Code of Conduct, the Policy against Violence & Harassment in the Workplace and the Diversity, Equity and Inclusion Policy, make

**HUMAN RESOURCES  
DE&I POLICY**

further commitments to ensure equal opportunities and an inclusive work environment for all.

Within the context of gender equality at work, the Company is committed to taking the appropriate measures in order to eliminate all kinds of discrimination against women in the fields of employment, equal pay for work of equal value, vocational education and training, as well as in decision-making processes.

The Company respects the privacy of its workforce data (GDPR) when collecting personal information or inspecting workplaces.

- **Freedom of association**

METLEN acknowledges and respects the fundamental rights of freedom of association and collective bargaining, without fear of retaliation or harassment, within the framework of national legislation and existing collective bargaining agreements. In case employees are represented by a legally recognized union, the Company is committed to encouraging open and constructive social dialogue with their legally elected representatives, on the basis of mutual trust and aiming at mutual benefit.

- **Disciplinary practices**

The Company's disciplinary practices are implemented, if needed, as a means of management, to prevent and avert unacceptable behaviour, in accordance with labour law.

The Company investigates the complaints brought to its knowledge and acts accordingly, applying the system of disciplinary penalties as defined in its Labour Regulation, where deemed necessary. In cases where the implementation of disciplinary measures is required, the Company is committed to respecting the basic rights of its employees, such as: a) access to the details of misconduct allegations, b) responding to and/or appealing disciplinary decisions, without suffering any adverse impacts and (c) depending on the gravity of the disciplinary misconduct, provision of advice and/or representation, if they wish, by employee representatives during the evaluation of disciplinary decisions.

METLEN is committed to implementing its disciplinary practices in a consistent and fair manner with regards to its entire workforce, while personal characteristics, such as gender, ethnic origin, religion, etc. do not affect the results of the investigation of a possible misdemeanour or the severity of a possible sentence.

- **Rights of Local Communities**

METLEN acknowledges its influence on the communities in and near which it operates. It is committed to communicating and consulting with local communities and their social partner groups, prior to and during its activities, so as to prevent, mitigate and eliminate potential adverse impacts of its operation, by taking appropriate measures. When needed, the Company is also committed to participating in dialogue with the social partners of its local communities on human rights issues related to its operation.

Moreover, it is committed to respecting and supporting local community rights, including the rights of indigenous people, regarding the use of land and natural resources, as well as the preservation of local cultural heritage, as key elements of the communities' sustainability.

- **Right to Water and Sanitation**

The Company also ensures that appropriate action is taken to address the concerns

## HUMAN RESOURCES DE&I POLICY

of local communities regarding the potential negative impact of its activities on citizens' access to resources or to various other livelihoods. Access to clean, safe, and free water and sanitation in particular, is recognized as a fundamental human right essential for life, health, and dignity. METLEN is committed to supporting efforts to ensure that the local communities in which it operates, as well as society as a whole, have equitable access to quality water resources without facing undue financial or physical barriers. The Company's operations prioritize the sustainable use and protection of water sources, working to prevent contamination and over-extraction that could jeopardize availability for local populations.

- **Product Management - Rights of Costumers, Consumers & End-Users**

The Company complies with the relevant national laws, international guidelines and industry standards with regards to the design, production and marketing of its products and services.

The Company is committed to monitoring and protecting the right to health, safety and privacy of its customers, consumers and end-users that arise from the use or provision of its products, while also protecting vulnerable and economically disadvantaged customers from potential disproportionate impacts or barriers. METLEN safeguards access to safe, high-quality products and services as well as accurate and transparent information, while in cases where training or other measures are required for the safe use of the Company's products, METLEN takes all steps necessary, in order to ensure that end users are aware of said requirements. Additionally, the use of raw materials is conducted in alignment with human rights considerations, ensuring that all sourcing, procurement, and production processes respect the dignity and rights of individuals and communities.

- **Security Practices**

The Company undertakes that its contracts with private security companies (where such companies exist) include requirements related to international standards for the protection of human rights, law enforcement and the use of violence. Moreover, it takes into account any past illegal or abusive conduct by the Company's security guards following a relevant investigation and permits the termination of the contract when knowledge of such behaviour emerges.

METLEN is committed to informing and training all security personnel on rules of conduct based on international standards governing the protection of human rights, as well as on law enforcement and the use of violence.

## 7. Transparency & Communication

Respecting the Transparency Principle, METLEN is committed to sharing information about its progress in monitoring the impact and implementation of the Human Rights Policy in all its activities with relevant stakeholders.

Using internal communication tools such as the intranet, the Policy is communicated to all Company employees in Greece and abroad, while suppliers and business partners also receive a copy. The Policy is also accessible to all other groups of internal and external Stakeholders through the official corporate website.

## 8. Reporting of Policy Violations

METLEN gives its employees the opportunity to express any concerns, as well as to report incidents of human rights violations, through the main mechanism for reporting violations of the Code of Business Conduct (reports - anonymous or anonymous -), via:

**HUMAN RESOURCES  
DE&I POLICY**

1. the Electronic Reporting Platform: <https://metlen.ethics.help/web/en>
2. email to: metlen[at]ethics.email (anonymously linked to the abovementioned Electronic Reporting Platform, without revealing the email address of the reporter).

Additionally, reports can be submitted by employees linked to the Company by any type of current, former or candidate employment relationship, as well as any person working under the supervision and direction of contractors, subcontractors and suppliers of METLEN Energy & Metals S.A.") through the corporate METLEN Energy & Metals S.A. reporting channels.

At the same time, the Company is committed to investigating and addressing the concerns of employees, as well as to resolving complaints by taking corrective action, while abstaining from any action against any employee who reports, in good faith, any real or alleged inappropriate behaviour believed to violate the Policy, will not be tolerated.

## **9. Review & Approval**

The People Experience & Intelligence Director is responsible for developing the Policy, as well as reviewing it annually to determine if there is a need for revision.

The Policy is updated by the People Experience & Intelligence Director in response to any significant internal changes and/or external changes (e.g., changes in the regulatory framework).

The Policy and any revised version are approved by the Board of Directors.