

SWISSPEARL

Swisspearl Group Human Rights Policy



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Background

At Swisspearl we recognise our responsibility and we are committed to respect human- and labour rights both in our own operations and in our relations with business partners. We want to maintain our reputation as a company with a high level of integrity, trustworthiness and to deliver a fair, respectable, equal and safe Swisspearl for all our stakeholders. This Policy ratifies Swisspearl's commitment to human rights and labour rights in our own operations as well as among the business partners whom we work with.

Our human rights approach is based on the International Bill of Human Rights and the International Labour Organisation's (ILO) eight core Conventions, including the Declaration on Fundamental Principles and Rights at Work. Where national law and these international human rights standards differ, we follow the higher standard.

Policy statement

We wish to promote a working environment that is characterised by respect and fairness, equality and non-discrimination, being harassment-free. We respect labour rights and data privacy. We do not accept any form of forced labour, nor child labour. We support our employees in understanding what human rights are, and how they apply to their work.

We respect and promote all human rights, but we also devote special attention to areas of our business, where we are in danger of having an adverse impact on human rights. To that end, we are committed to observe the principles of the UN Global Compact and to conduct our business in alignment with the UN Guiding Principles on Business and Human Rights. This means that we are committed to continuously work on:

- Identifying our human rights risks,
- Developing means to manage adverse impacts,
- Monitoring our performance,
- Providing access to remedy, and
- Communicating our efforts.

Scope

Our Human Rights Policy applies to all legal entities and employees in Swisspearl Group AG and its, directly and indirectly owned, subsidiaries (collectively referred to as "Swisspearl").

Roles and responsibilities

Every Swisspearl employee is personally responsible of following this policy and promote the development of a culture that supports the respect for human and labour rights. Furthermore, we have set out the core principles of business conduct in our Code of

Conduct. Moreover, we expect that business partners adhere to this commitment and follow and support the principles set out in this policy and in our Supplier Code of Conduct.

Definitions

Swisspearl recognizes every human being as free and equal in dignity and rights when at work. We are committed to respect human and labor rights both in our own operations and in our relations with business partners in our value chain. Our human and labor rights approach focuses especially on health and safety, labor relations, diversity and inclusion, discrimination, stakeholder engagement, illegal labor practices and right to privacy.

The following highlights Swisspearl's standards of good business conduct in respect to human and labor rights, which all our employees are expected to adhere to as minimum expectations.

- Follow all the laws, regulations, collective agreements and internal policies in respect to human and labor rights.
- Consider how your decisions may adversely impact human and labor rights in our own operations and in the value chain
- Report any breaches or suspected violations of our standards to Management, Group General Counsel or through our Whistleblowing channel.
- Handle promptly all reports at the appropriate level in the organization and apply learnings to facilitate continuous improvement.

Health and safety

At Swisspearl, we recognize that the health, safety, and well-being of our people are fundamental human rights and essential to our success. We are committed to providing and continually improving safe, healthy, and decent working conditions for all employees and business partners. Designated staff are responsible for day-to-day management, monitoring, and reporting of health and safety performance. We commit to:

- No harm: We strive for no harm to our personnel, contractors, and other business partners, and engage stakeholders in reducing the risk of workplace accidents, occupational diseases, and stress-induced illness.
- Safe working environment: We observe, ensure, and promote a safe and healthy working environment—both physical and mental—supporting the health and well-being of all employees.
- WASH: We provide access to potable drinking water, adequate sanitation, and hygiene facilities at all workplaces, in accordance with international standards.
- Emergency preparedness: We maintain robust emergency preparation and response procedures, including regular drills, clear evacuation plans, and accessible emergency exits.
- Hazardous materials: We ensure safe handling, storage, and disposal of hazardous materials, with appropriate training, labelling, and access to safety data sheets for all relevant staff.
- Health and safety Management Systems: We implement and maintain management systems that identify, assess, and control health and safety risks, including regular

internal audits, corrective action processes, and continuous improvement mechanisms.

- Building, electrical, and fire safety: We ensure all workplaces meet or exceed applicable standards for building construction, electrical safety, and fire protection, including regular inspections and maintenance.
- Training and supervision: We provide the necessary resources for instructing, training, and supervising employees to manage health and safety aspects of our operations appropriately.
- Stakeholder engagement: We encourage open communication and participation of employees and other stakeholders in health and safety matters, including reporting hazards and suggesting improvements without fear of retaliation.
- Supply chain: We expect our suppliers and contractors to uphold equivalent health and safety standards and monitor their performance accordingly. We set our expectations for suppliers in the Swisspearl Supplier Code of Conduct.
- Continuous improvement: We regularly review and update our health and safety policies, procedures, and performance, taking corrective actions as needed and striving for measurable improvement.

Labour relations

We promote harmonious labour/management relations whether those are based on individual or collective basis. Our aim is productive work environments, and fair and equitable treatment of employees. We support the principle to provide our employees a living wage as defined in the relevant local context.

- Ensure compliance with applicable legislation regarding legal minimum wages and all legally mandated benefits, including employee contributions for social security benefits and services.
- Follow the local legislation or applicable collective bargaining agreement whichever is higher or obligatory. Adhere to stipulations in the working contracts as necessary regarding working hours, voluntary overtime and premium paid for it as well as minimum rest periods. Furthermore, ensure compliance regarding sick leave, parental leave and holidays.
- Recognise the right to rest and leisure. Ensure that all employees, including temporary, contract, and subcontracted workers at all Swisspearl locations are not required or permitted to work excessive hours.
- Ensure maintaining and follow up records of working hours, overtime, and rest days.
- Respect the right to freely associate, form or join organisations and to bargain collectively in accordance with recognized international standards, local laws and regulations.
- Also recognize the right of our employees to refrain from collective bargaining.

Stakeholder engagement

At Swisspearl, we seek transparency and are open to engage with external stakeholders in a constructive manner. Our aim is to build relationships based on openness and trust, draw on stakeholders' know-how, and support delivery of results.

- Conduct stakeholder engagement in accordance with the Swisspearl Code of Conduct and other policies.
- Encourage dialogue and engagement with stakeholder groups with reasonable interest in our operations, such as local communities, non-governmental organisations, civil society organizations, and others.

Illegal labor practices

Swisspearl firmly opposes all forms of illegal labour practices and does not use compulsory or forced labour in any form. We are committed to combat such practices, including also child labour to the extent we identify such risks in our operations or in our supply chain. Workers should work at their own will and be free to leave or change their employment if they choose, and our employment practices are aligned with relevant international standards and applicable laws.

- Immediately report concerns of underage workers or involuntary labour in our operations. Refrain from any practices that will give rise to a risk of involuntary or child labour.
- Conduct supply chain due diligence aimed at eliminating direct and/or indirect involvement in human trafficking and prohibiting all forms of forced, bonded or indentured labour, involuntary prison labour. This applies to all workers, whether hired directly, by a contractor or recruited through a recruitment agency.

Forced labour

- Allow freedom of movement for all employees during their employment and permit termination of employment after reasonable notice.
- Do not retain original identification documents, deposits or financial guarantees or withhold wages outside of a legal contractual agreement.

Child labour

- Ensure to employ persons only at an age or higher than defined in the Minimum Age for Admission to Employment or Work in the 10 Principles of the UN Global Compact.
- Protect young workers up to the age of 18 from working conditions that are likely to jeopardise their health, safety or morals, or interfere with their schooling needs.

In accordance with §54 of the 2015 UK Modern Slavery Act, Swisspearl publishes UK Modern Slavery Statement.

Right to privacy

Every day in Swisspearl we may receive, use and store personal information about employees, potential employees, customers, partners and website users. This information is subject to personal data regulation across our footprint and must be handled lawfully and appropriately:

- Always handle personal data in accordance with Swisspearl Group Personal Data Protection Policy, Swisspearl Group IT Policy and other applicable personal data regulation.
- Carefully consider the sensitivity level of personal data when handling it.

- Ensure you follow all handling, confidentiality, storage and cleaning principles and obligations for personal data in your possession and under your responsibility.
- Limit the handling of personal data to what is necessary for specific business purposes.
- Disclose personal information to third parties only against verified identity, entitlement and lawfulness as well as compliance to Swisspearl Group Personal Data Protection Policy

You can find more information about our handling of personal data in our Swisspearl Group Personal Data Protection Policy and related guidelines.

Harassment, abuse, discrimination, workplace equality

Swisspearl is committed to eliminating all forms of harassment, abuse and discrimination as well as promoting workplace equality, as set out in our Code of Conduct and related policies.

Related policies

Swisspearl Group Code of Conduct, Swisspearl Group Supplier Code of Conduct, Swisspearl Group UK Modern Slavery Statement, Swisspearl Group Whistleblower Policy, Swisspearl Group Personal Data Protection Policy, Swisspearl Group IT Policy.

Violation of the policy

We expect that all Swisspearl employees and business partners consider how their decisions may adversely impact human rights and labour right, and to act accordingly on this. Failure to comply with this Policy will result in disciplinary action, including, but not limited to, the issue of a reprimand or warning, probation or suspension without pay, demotion, reduction in salary and dismissal, subject to local laws and regulations. Certain violations of this Policy may require the Swisspearl to refer the matter to law enforcement authorities for investigation or prosecution.

Policy information

This policy must be reviewed by the Group Executive Director HR and approved by the Swisspearl Group Executive Management, then followed by an approval of Swisspearl Board of Directors at least once a year. It may be amended at any time with the approval of Swisspearl Board of Directors. In the event of any discrepancies between the English version of this Human Rights Policy and a translated version, the English version will be binding.

Contact

If you have any comments or questions about this Human Rights Policy, please contact the Group General Counsel, legal (at) swisspearl.com

Change log

Version	Date	Description of the change	Changed by
2	7.8.2025	Changes to Background, Health and safety, Labour relations according to the requirements of Cradle to Cradle certification. In connection to the same, Discrimination and Workplace equality moved to the Code of Conduct.	P. Koskela