

Social Ethics and Compliance & Employee Value Proposition

,

Social Sustainability Policy

Workplace health, safety and well-being

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1. Introduction

Since its founding in 2018, Evergreen Garden Care has built a culture based on the values of trust, mutual respect and dialogue. Evergreen Garden Care management and employees all over the world work daily to create and maintain positive individual and collective relationships, and are expected to do so as a core part of their job.

This Policy reinforces Evergreen Garden Care's commitment to long-term business development through an open dialogue with its employees and external stakeholders in line with its Employee Value Proposition concept.

The Employee Value Proposition policy not only requires strict compliance with the law, but it guides our actions even if the law is more lenient or where there is no applicable law at all.

Social governance structure

We use a multi-disciplinary governance approach to support our people. The Senior Management Team is responsible for reviewing and overseeing our culture and evaluating management's efforts to align our corporate culture with our LEAD behaviours and long-term strategy. We also incorporate social-based performance objectives, such as support of Diversity, Equity and Inclusion (DEI) initiatives and safety, into performance evaluations.

Within each Business Unit, Human Resources (HR) oversees plans related to team member career development, health and wellness, and engagement.

During the COVID-19 pandemic, Evergreen Garden Care has continued to operate in impacted areas, hiring and connecting people around the world. We took the opportunity to implement more automated processes and access to information, as well as developing stronger virtual employee communities and social internal networks.

2. Scope

This policy applies to our company and its subsidiaries. It may also refer to suppliers and partners.

What is managed by the Business Units and local HR

Employment contract, wages, recruitment, remuneration, relations with Unions, Living wage, Minimum wage

What is managed at Corporate level

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Code of conduct

Social Sustainability principles.

Career management process, performance review, end of year assessment, career progression LEAD behaviours

ETHICS AND COMPLIANCE

3. List of our Ethics and Compliance policies

On googledrive

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Doc Title

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Code	File Name	Format	Revision Date	Next revision date	Owner
COMP0001	ISO 37301 - Compliance management systems	word doc	1/4/22	1/4/2023	Sustainability Director
COMP0002	Compliance Management Review	word doc	1/5/22	1/5/2023	Group Genera Councel
COMP0003	Continuous Improvement	word doc	1/6/22	1/6/2023	Sustainability Director
COMP0004	ISO 26000 - Guidance on social responsibility	excel	1/3/22	1/3/2023	Sustainability Director
COMP0005	ISO 27701 Security techniques — Extension for privacy information management	excel	1/5/22	1/5/2023	Sustainability Director
COMP0006	Carbon off setting and climate change	word doc	1/6/22	1/6/2023	Sustainability Director
COMP0007	Due diligence on mandatory sustainability reporting	word doc	10/4/22	2/17/2023	Sustainability Director
COMP0008	Climate and general financial risk assessment	word doc	16/8/22	2/18/2023	Sustainability Director
COMP0009	Stranded assets' risk assessment	word doc	16/8/22	2/19/2023	Sustainability Director
COMP0010	ISO20400 Sustainable procurement — Guidance	word doc			Sustainability Director
Legal0001	Code of conduct	word doc	1/4/22	1/4/2023	Group Genera Councel
Legal0002	EGC's Governance structure	word doc	1/4/22	1/4/2023	Group Genera Councel
Legal0003	Data privacy executive document	word doc	1/4/22	1/4/2023	Group Genera Councel
Legal0004	Collection, processing, use, retention and disposal policy	word doc	1/4/22	1/4/2023	Group Genera Councel
Legal0005	Data breach security policy	word doc	1/4/22	1/4/2023	Group Genera Councel
Legal0006	Speak Up procedure	word doc	1/6/21	2/14/2023	Group Genera Councel
Legal0007	Risk Mapping document	word doc	1/7/21	2/15/2023	Group Genera Councel
Legal0008	Industry bodies	word doc	5/4/22	2/16/2023	Group Genera Councel
Legal0009	General Data Protection Regulation	powerpoint	1/3/22	1/3/2023	Senior Legal Counselor
Legal0010	Personal data	word doc	1/4/22		Legal
Legal0011	Modern Slavery Act	word doc	1/4/22		UK HR
Legal0012	IT policy	word doc	1/4/22	2/13/2023	Group Genera Councel
Legal0013	Equal opportunity	word doc	1/4/22		HR
Legal0014	Health and Safety	word doc	1/4/22		
Legal0015	Disciplinary policy	word doc	1/4/22		
Legal0016	Grievance	word doc	1/4/22		
Legal0017	Diversity and inclusion	word doc	1/4/22		

4. Ethics and Compliance

Business ethics

We'll always conduct business with integrity and respect to human rights. We'll promote:

- Safety and fair dealing
- Respect toward the consumer
- Anti-bribery and anti-corruption practices

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We have always exceeded the standards laid down by the REC Code of Good Recruitment Practice, ensuring that we conduct our business ethically and to the highest standards. We focus on long term client relationships built on trust and delivering an outstanding service. https://www.rec.uk.com/recruiters/compliance/code-professional-practice

As an example in the UK:

Practically, we ensure that where appropriate, our staff are aware of and comply with the provisions of the following laws and any amendments to them:

Employment Agencies Act 1973;

Conduct of Employment Agencies and Employment Businesses Regulations 2003; Agency Workers Regulations 2010; Equality Act 2010; along with legislation covering equal pay, taxation, health & safety, data protection, immigration, rehabilitation of offenders, telecommunications privacy and working time.

All recruitment procedures followed by the Evergreen Garden Care will be on the basis of fair and objectively justified criteria. Where job applicants have a disability the position of the applicant will be reviewed and all possible steps will be taken to ensure that the applicant does not suffer from any disadvantage in the recruitment process. Evergreen Garden Care will ensure that the provisions of the Equality Act 2010 will be applied in all cases, in particular in relation to applicants who suffer from disabilities.

Evergreen Garden Care only conducts business with companies who operate ethical opportunities and diversity policies. Should Evergreen Garden Care attention be drawn to a customer or supplier which does not comply with ethical procedures, we will notify in writing or verbally to explain the problem. Should no action be taken, Evergreen Garden Care would stop working with this third party and, if the circumstances warrant, report the incident to the relevant authorities.

Legality

EGC will:

- Respect the law
- Honor its internal policies
- Ensure that all its business operations are legitimate
- Keep every partnership and collaboration open and transparent

Ethics and Business Integrity

Our commitment to behave ethically and with integrity extends beyond mere compliance with laws and regulations. We have adopted relevant tools and implemented training to continuously raise our employees' awareness to identify risks and manage difficult situations appropriately. As a business with a wide range of activities, spread across many countries and involving a large number of partners, we pay the closest attention to ethical standards in the way we conduct our operations, especially in our interactions with our supply chain.

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We have operations across the globe. Robust corporate and local governance structures are in place to ensure we deliver on our commitments, supported by clear rules and policies.

Duty of care - the New EU Directive

Following the proposal by the European Commission on 23 February 2022 of the Corporate Sustainability Due Diligence and amending Directive (EU) 2019/1937, we have reframed our Corporate reporting to include Digital Responsibility.

Code of Business conduct - Ethics & Business Integrity (E&BI)

Our Code of Conduct defines the standards of ethical conduct that employees must apply when working for Evergreen Garden Care. It is both a reference manual and a practical tool, providing each employee with guidance about the attitudes to adopt in interactions within and outside the company. It includes our Values and Leadership Behaviours. Our policies are listed in appendix.

Anti-Bribery & Anti-Corruption (ABAC)

Our anti-corruption and anti tax evasion policy lays down guidance for employees on how to interact with third parties on behalf of Evergreen Garden Care, to help them comply with laws and regulations and to promote a culture of ethics and integrity. Training for employees is implemented and delivered regularly. We align our existing data management practices with internationally-recognized standards.

Whistle-blowing

The procedure is set up for Evergreen Garden Care employees and is guaranteed to be independent and to protect anonymity, in accordance with local regulations and practices. Any employee who encounters a problem or who believes in good faith that a breach has occurred or is about to occur of any law, regulation, industry code of conduct, Evergreen Garden Care standard or policy, or of any principle contained in the Code of Ethics, can use this system to report it by whatever means he or she sees fit.

Policy elements

We want to be a responsible business that meets the highest standards of ethics and professionalism. Our company's social responsibility falls under two categories: **compliance** and **proactiveness**. Compliance refers to our company's commitment to legality and willingness to observe community values. Proactiveness is every initiative to promote human rights, help communities and protect our natural environment.

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Our operations in each country shall take all necessary steps and put mechanisms in place in order to ensure compliance of its employees with the Evergreen Garden Care Corporate Business Principles, the Evergreen Garden Care Code of Business Conduct and this Policy.

According to the Evergreen Garden Care Code of Business Conduct, all employees shall report cases of non-compliance with the Code, which have to be properly investigated. Local Business Unit management shall provide the procedures and establish mechanisms to manage the complaints that may be made, where appropriate, on a confidential basis.

Evergreen Garden Care prohibits retaliation against any employee or employee representatives for the exercise of the right to complain within the respective national or local legal framework.

5. Diversity, Equality & Inclusion Policy

Evergreen Garden Care is committed to providing an inclusive work environment that encourages and welcomes diversity with a zero tolerance policy of harassment and discrimination. Our policy is to meet and exceed the demands of the Equality Act 2010.

The aim of this policy is to also ensure that all members of staff know that they are able to work in an environment that is free from discrimination and harassment and are able to achieve their full potential in their job without distraction. Evergreen Garden Care will make decisions without reference to discriminatory criteria. All members of staff must be aware of this Policy and should abide by its terms at all times including in their dealings with clients, candidates and each other.

Scope

This policy applies to all staff who are in the employment of the Evergreen Garden Care and all contract staff who are contracted with Evergreen Garden Care. It also applies to all other individuals with whom employees come into contact during the course of their employment, and in particular to job applicants.

Diversity, Equity & Inclusion (D,E&I)

We know increased diversity enhances our business and strengthens our ability to prepare for a net zero carbon economy. Having a diverse workforce stretches us through the power of differing opinions, viewpoints, knowledge, skills and cultural perspectives.

By fostering inclusivity and equality of opportunity, we empower all employees to thrive and improve the performance of our teams. With the Black Lives Matter anniversary as a reminder to

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all industries, metrics are continuously reviewed at Evergreen Garden Care in all aspects of D,E&I and we are continuing our progress in this aspect of social sustainability.

Employee Conduct

If an employee is at all unsure of anything under this policy they should speak to their manager. Appropriate action under the disciplinary procedure may, however, be taken against an individual who makes a malicious complaint.

Any complaints of discrimination and/or breaches of this policy should be reported to the Managing Director as soon as possible.

Equality & Diversity

We believe a diverse workforce is a more effective workforce. People of different backgrounds, education, and ways of thinking allow for a more robust source of ideas, innovation, management styles, and capabilities.

We are committed to meeting the objectives of the Equalities Act 2010. We treat people with protected characteristics with fairness and equality, and ensure that our Code of Conduct is applied to everyone. For clarity, nobody will be treated less favourably than another on grounds of; age, sex, disability, gender reassignment, gender identity or gender presentation, marriage, civil partnership, pregnancy, being a parent, being a carer, race, religion/belief, and sexual orientation. This also includes anyone perceived to have one of the above characteristics whether they identify with it or not, and also covers anyone associated with a person who has, or is perceived to have, one or more protected characteristics.

We have a zero tolerance policy on discrimination. Please see the sections titled 'Discrimination' and 'Procedure for dealing with infringements of this policy'. Discrimination may be treated as part of the disciplinary procedure, or grievance procedure.

Where an employee has a disability or health condition we are committed to ensuring they are able to work conveniently and comfortably, using an occupational health service where necessary, so that their performance does not suffer. Where appropriate to job roles we offer home working and flexible working hours.

Inclusion

An inclusive policy promotes staff satisfaction and retention, reducing costs, and maximising employee experience. We believe that a truly inclusive workplace allows everyone to feel safe and relaxed about their identities, allowing them to focus 100% on their job without the expectation, or worry, of

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harassment. A workforce who can focus 100% on the job in hand results in a more successful company. Nobody should need to spend time worrying about who knows about their protected characteristics and also know that there are policies in place to protect them should they experience harassment. This policy should be read in-conjunction with Evergreen Garden Care Code of Conduct.

Evergreen Garden Care has a zero tolerance policy of harassment based on any grounds stated in the Equalities Act 2010 in addition to recognising people who act as carers, and the whole spectrum of gender identities, not just the gender binary identities of male and female specified by the Equalities Act 2010. Harassment may be treated as part of the disciplinary procedure, grievance procedure or as sexual harassment depending upon its nature.

Discrimination

The types of discrimination we recognise are listed below and apply to all the protected characteristics listed in the section headed 'Equality and Diversity'.

Direct Discrimination:

Direct Discrimination occurs when an individual is treated less favourably than another person on any of the aforementioned grounds.

Indirect Discrimination:

Indirect discrimination occurs when a requirement or condition is applied to an employee, but the employee finds they are not able to meet this because they possess a protected characteristic, and the requirement or condition is not justified. This means that if the requirement or condition has a disproportionate effect on the particular group, it will be indirect discrimination.

Associative Discrimination

It is unlawful to discriminate against a person because of their association with somebody who possesses a protected characteristic.

Perceptive Discrimination

Perceptive discrimination occurs when somebody is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they in fact do not possess that characteristic.

Instances of Discrimination

Individuals can be subjected to discrimination in a wide variety of ways. These include, but are not limited to the following activities:

- Creation of job adverts.
- Writing recruitment literature and advertising.
- Judging the suitability of a candidate.
- Promotion and career development.
- Providing opportunities for training and development.
- Writing terms and conditions of employment.
- Providing access to employment related benefits and facilities.



- Grievance handling and the application of disciplinary procedures.
- Selection for redundancy.

Procedure for dealing with infringements of this policy

This policy makes it clear that any form of discrimination, intended or accidental, is not acceptable. Infringements of this policy will be dealt with seriously as part of the disciplinary procedure, grievance procedure or as sexual harassment depending upon its nature. Evergreen Garden Care may involve either informal or formal action depending on the seriousness of the case.

The policy will be amended as appropriately to meet the demands of future legislation

6. Digital Ethics and Responsibility

While Digitalization opens up an almost unlimited range of communication, advances knowledge sharing and general progress in the business, as well as improving our corporate efficiency and sustainability, it also raises new social and environmental problems that require solutions. These include matters of personal data protection, issues linked to business cyber security and environmental impact of Information, Communication and Information tools. Our Corporate Digital Responsibility is not just about ensuring compliance with laws such as the GDPR when handling customer data. It means educating our teams on digital citizenship and responsible practices. The first formalised learning about Responsible Digital and Sustainable IT started in 2022 and information is documented in our Intranet.

Data privacy

We continue to strengthen our capabilities to protect personal data belonging to individuals, such as our employees, partners and consumers, and commercially sensitive data. Our systems and protocols enable us to effectively protect personal data and manage privacy risks to our business services, functions, information systems, assets, and people.

Cybersecurity

We have articulated clear requirements for cybersecurity through incident response procedures to help prevent interruptions and cyberattacks. We have implemented data breach procedures and a complaints procedure for employees, customers and third parties. A training is provided to employees via Cybersafe.

KPIs

	2018	2023
Training modules	1	14

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Commented [A1]: ?

Commented [A2R1]: The visio education session I did in July with all the material on the garden shed (instead of google drive access). The sessions will carry on as part of next years' follow up audit

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Employees trained on Ethics & Compliance - annually or as part of the	5% (Management)	+70%
onboarding programm		
Live in person/zoom versus access online	100 - 0	10 - 90
anytime		
Breach of code of Ethics	0	0
Whistle blowing reporting	0	0
Notifiable personal data breach	0	0

Self- assessment

Evergreen Garden Care carry as self-assessment against those standards

Governance, Compliance and Non-Financial KPIs

Standard self-assessment (corrective action plan in p Year	2018	2022
Data protection training	50%	100% of targeted population
Anti-corruption and anti-tax evasion training		100% of targeted population
Competition law training		100% of targeted population
ISO26001 Guidance on social responsibility	N/a	Self-assessment completed
		(corrective action plan in place)
ISO 27701:2019	N/a	Self-assessment completed
Security techniques — Extension to ISO/IEC 27001		(corrective action plan in
and ISO/IEC 27002 for privacy information		place)
management — Requirements and guidelines		
ISO37301 Compliance management systems	N/a	Self-assessment completed
		(corrective action plan in
		place)
ISO 20400 Sustainable procurement	N/a	Self-assessment completed
		(corrective action plan in
		place)
ISO 27001 Security techniques — Extension to	N/a	Self-assessment completed
ISO/IEC 27001 and ISO/IEC 27002 for privacy		(corrective action plan in
information management		place)

7. Personal Harassment and Bullying Policy

General

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This policy applies to all staff employed by Evergreen Garden Care and all contract staff who are contracted with Evergreen Garden Care. It also applies to all other individuals whom employees come into contact with during the course of their employment, including customers, suppliers and job applicants.

Definition of harassment

Harassment describes any behaviour that makes the recipient feel isolated, threatened, humiliated, undermined or reduced in dignity or respect. This policy covers all forms of harassment, victimisation and discrimination including, but not exclusive to age, sex, disability, gender reassignment, gender identity or gender presentation, marriage, civil partnership, pregnancy, being a parent, being a carer, race, religion/belief, and sexual orientation, or any other group or individual with protected rights and characteristics defined by the Equality Act 2010. It also includes bullying and other inappropriate behaviour which leads to the detriment of others.

Any instances of harassment found to be upheld following a disciplinary investigation may result in action being taken against the individual(s) involved up to and including summary dismissal.

Expected behaviour

Evergreen Garden Care values the individuality and contribution of all its staff and is committed to ensuring that all staff are treated equally on their merits and seeks to ensure that the working environment is free from harassment, bullying, victimisation or discrimination. Evergreen Garden Care deplores any and all forms of harassment, bullying or discrimination, whether intended or accidental, and will respond seriously to any situation where it is apparent that these have arisen.

Although Evergreen Garden Care will act to prevent harassment, bullying, victimisation or discrimination as far as possible, each employee has an equal responsibility for their own behaviour and for ensuring that they comply with this policy.

If an individual feels that they are being harassed, bullied, victimised or discriminated against in any way, or if they are aware of any cases of harassment, bullying, victimisation or discrimination affecting others, then they should raise the matter with their manager who will consider the necessary action to be taken. If necessary the complaint can be raised through Evergreen Garden Care's grievance procedure

Managers

All managers have a particular responsibility to discourage and prevent unequal treatment from occurring and must ensure they:

- Uphold the values of Evergreen Garden Care and the provisions of this policy and do not encourage harassment, bullying, victimisation or discrimination through their own actions;
- Take prompt action to stop these as soon as it is identified;
- Take allegations of this behaviour seriously and ensure there is no victimisation of any member of staff who makes or assists someone else to make a complaint;

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- Ensure no offensive or potentially offensive material is displayed at work; and
- Make clear that harassment, bullying, victimisation or discrimination in any form is unacceptable and that it will be dealt with seriously as a disciplinary matter, under the disciplinary procedure.
- If you are at all unsure of anything under this policy you should speak to your manager. Action will be taken to ensure that an individual who raises an issue or brings a complaint under this policy will not suffer any form of victimisation for having done so.

Appropriate action under the disciplinary procedure may, however, be taken against an individual who makes a malicious complaint.

Raising a complaint about harassment, discrimination or bullying

Informal complaint

If an employee is, or feels they are, the victim of minor harassment, bullying, victimisation or discrimination, they should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If the employee feels unable to do this verbally then they should hand a written request to the harasser.

Formal complaint

Where the informal approach fails or if the harassment, bullying, victimisation or discrimination is more serious, the employee should approach its HR contact and formally complaining about the behaviour.

The HR contact will investigate the complaint thoroughly in accordance with Evergreen Garden Care's disciplinary procedure. Those involved in the investigation will be required to act in confidence and any breach of confidence will be a disciplinary matter.

When the investigation has been concluded, a draft report of the findings and the investigator's proposed decision will be sent in writing to the employee and the alleged harasser.

Should the conclusion of the investigation, and the report, indicate that the complaint is well-founded, that harasser will be subject to disciplinary action. An employee who receives a disciplinary award as a result has the right of appeal.

An employee bringing a complaint of harassment, bullying, victimisation or discrimination can be assured that they will not be victimised for having raised the complaint. However, any individual who brings a complaint that is found to be untrue or with malicious intent will themselves be subject to disciplinary action.

Harassment by third parties on employees

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Evergreen Garden Care will take steps to protect employees in situations where they experience repetitive harassment related to any protected characteristic, listed in the section marked 'Definition of harassment', by third parties, for example customers, suppliers, members of the public. Where this occurs the employee must report it immediately to their manager who will deal with all complaints.

8. Human rights

Evergreen Garden Care is committed to respecting and promoting human rights and good labour practices. Respecting human rights is core to Evergreen Garden Care's corporate values and is embedded in our Code of Conduct.

Our references :

- The UN Framework for Business and Human Rights is integrated in our business principles.
- The UNGP which sets out principles to guide companies in meeting their responsibility to respect human rights.

Human rights

Our company is dedicated to protecting human rights. We are a committed equal opportunity employer and will abide by all fair labor practices. We'll ensure that our activities do not directly or indirectly violate human rights in any country (e.g. forced labor).

Protecting people

We'll ensure that we:

- Don't risk the health and safety of our employees and community.
- Avoid harming the lives of local and indigenous people.
- Support diversity and inclusion.

HUMAN RESOURCES

We educate all employees to live by the EGC business principle on environmental sustainability "Evergreen Committed to sustainability". We:

• train all employees on this policy;

• create conducive workplace conditions that help all employees take personal responsibility for protecting the environment by promoting application of this policy to day-to-day activities at the workplace as well as at home;

• ensure environmental sustainability is covered as part of relevant training, workshops and meetings to raise commitment of our employees, suppliers, business partners and the community at large;

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• promote corporate and personal responsible behaviour towards the environment through publishing success stories and recognising positive initiatives to embed these practices within EGC and the local community.

9. Respect, Dignity & Fair Treatment

Business can only flourish in societies where human rights are respected, upheld and advanced. Evergreen Garden Care recognises that each business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts. There is both a business and a moral case for ensuring that human rights are upheld across Evergreen Garden Care's operations and value chain. Evergreen Garden Care is committed to ensuring that all employees work in an environment that promotes diversity and where there is mutual trust, respect for human rights and equal opportunity, and no unlawful discrimination or victimisation.

This Code Policy sets out what employees must do to ensure that all workplaces maintain such an environment.

Employees must:

• Respect the dignity and human rights of colleagues and all others they come into contact with as part of their jobs

• Treat everyone fairly and equally, without discrimination on the grounds of race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views. This includes consideration for recruitment, redundancy, promotion, reward and benefits, training or retirement which must be based on merit

Line Managers must:

Ensure all employees' work is conducted on the basis of freely agreed and documented terms of employment, clearly understood by and made available to relevant employees and others working for Evergreen Garden Care

• Ensure that all employees have obtained employment with Evergreen Garden Care without the employee having paid a recruitment fee or related cost directly or indirectly as guided by the International Labour Organisation standards

• Ensure all employees are provided with fair wages including a total remuneration package that meets or exceeds legal minimum standards or appropriate prevailing industry standards, and that remuneration terms established by legally binding collective agreements are implemented and adhered to. Other than legally mandated deductions, all other deductions from wages require the express and written consent of the employee.

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• Respect employees' rights to form and join a legally recognised union of their choice choice or any other body representing their collective interests, and establish constructive dialogue and bargain in good faith with trade unions or representative bodies on employment conditions, labour management relations and matters of mutual concern, to the extent practicable taking national laws into consideration

• Comply with local legal requirements in relation to short-term, casual or agency employees

• Maintain a clear and transparent system of employee and management communication that enables employees to consult and have an effective dialogue with management

• Provide transparent, fair and confidential procedures for employees to raise relevant concerns. These must enable employees to discuss any situation where they believe they have been discriminated against or treated unfairly or without respect or dignity.

Employees must not:

Engage in any direct behaviour that is offensive, intimidating, malicious or insulting. This includes any form of sexual or other harassment or bullying, whether individual or collective and whether motivated by race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views.

• Engage in any indirect behaviour which could be construed as sexual or other harassment or bullying, such as making offensive or sexually explicit jokes or insults, displaying, emailing, texting, or otherwise distributing, offensive material or material of a sexually explicit nature, misusing personal information, creating a hostile or intimidating environment, isolating or not cooperating with a colleague, or spreading malicious or insulting rumours.

• Work more than the regular and overtime hours allowed by the laws of the country where they are employed. All overtime work will be on a voluntary basis

Line Managers must not

Use, or permit to be used, forced or compulsory or trafficked labour. We have a zero tolerance of forced labour

• Use child labour, i.e. individuals under the age of 15 or under the local legal minimum working age or mandatory schooling age, whichever is the higher

• When young workers are employed (insofar as short-term work experience schemes and work that forms part of an educational programme are permitted), require or allow them to do work that is mentally, physically, socially or morally dangerous or interferes with their schooling by depriving them of the opportunity to attend school.



10. Labour rights

Commitment:

This publicly affirms Evergreen Garden Care's values and its commitment to embedding the policy in the way it does business.

LA BOUR ISSUE	CODE OF BUSINESS PRINCIPLES	RESPECT, Dignity and fair treatment policy	SUPPLIER CODE	
Freedom of association	2	2	Where allowable by law	
Collective bargaining	X	Z	Where allowable by law	
Wages/Living Wage	Committed to national legal minimum wage No living wage commitment	×	Compliance with national rules and regulations	
Limited working hours	Committed to national limits on working hours	(*)	Compliance with national rules and regulations	
Regular/stable employment	(X)	×	X	
Policy coverage (of other labour issues		1	
Non- discrimination	Implicitly: Commitment to diversity and respect for dignity of the individual	Z	(X)	
Prohibition of child labour		Z	Z	
Prohibition of forced labour		Z	2	
Harassment and harsh treatment		V	2	

Integration of the policies in the business and implementation with suppliers;

Effective integration of the policies in the business ensures they are known and widely supported by management, staff, business partners and suppliers.

In relation to embedding and communicating the policy, Evergreen Garden Care actively raises the awareness of all employees about Evergreen Garden Care's business principles.

Regional HR ensure they are aware of our policies and are required to sign to show they have understood it. Senior managers must take a test to demonstrate their knowledge of the policy content.

In general Evergreen Garden Care employees are proud of Evergreen Garden Care's policies and approach to sustainability and have expectations of Evergreen Garden Care behaving responsibly.



Risk assessment of our suppliers and comanufacturers

This is done by cross functional teams. Supplier at risk are audited.

R&D Every 6 months • R&D Packaging • R&D Formulation	Annually by BU CESH compliance	Every 6 months			
R&D Packaging	QESH compliance				
	 Cost of non-quality, Write-offs, customers fines, scraps, returns Risk Management 	Suppliers performance Third party performance Escalated major non conformances Consumer complaints Customer complaints			
100% compliance Targets – YoY improvements					
Certifications & Assessments					
Responsible Plastic Management (RPM) Circular Economy System XP X30-901 Carbon neutrality ISO 20400 Sustainable procurement — Guidance – Self assessment					
Communication					
, functions and by BU					
Documentation					
ISO9001 as standard – self assessment Business process management ISO 37001-2021 Compliance amagement systems ISO/IEC 27701:2019 Security techniques — Privacy Information management					
Due diligence exercise Risk assessment (TCFD)					
	ions & Assessments iven (RPM) ement — Guidance – Self mmunication t, functions and by BU coumentation tandard – self assessment procase management syste chiques — Privacy Informatio ability Tax & Risks filgence exercise	In the sessments See See See See See See See See See Se			

Sedex for our sites

- All our sites are SEDEX registered since 2022.
- The UK sites are also audited and have been since 2010. The closure of corrective actions is managed locally.
- For tracker see "0 Nomenclature Compliance documents" on google drive
- No KPIs is associated (conformance is yes / no for audit / registration)



Sites Registration

Sedex			Language P Help © Log out G EX ADVANCE 1 Garden Care France SAS
Home Company + Audit + User + M	Aember Directory Analytics e-Learning New p	latform O	uck Search
Search for Company			
Evergreen Garden Care	Search		
COMPANY NAME	COMPANY REFERENCE NUMBER	COMPANY TYPE	ACTION
Evergreen Garden Care	ZC419120182	Supplier (B Member)	View company
Evergreen Garden Care Australia	ZC419339305	Supplier (B Member)	View company
Evergreen Garden Care Austria GmbH	ZC420110011	Supplier (8 Member)	View company
Evergreen Garden Care Belgium	ZC418405624	Supplier (B Member)	View company
Evergreen Garden Care Austria GmbH	ZC420110011	Supplier (B Memb	er) View company
Evergreen Garden Care Belgium	ZC418405624	Supplier (B Memb	er) View company
Evergreen Garden Care France SAS	ZC131490438	Supplier (B Memb	er) View company
Evergreen Garden Care UK Ltd	ZC1077911	Supplier (B Memb	er) View company
	ZC172088920	Supplier (B Memb	

Site Name	Site Code	Audit Date	Audit Nu	umber	Audit Company Name	Findi Num		Finding Title
Gretna	ZS131568633	10/11/2022	ZAA4216	5 <u>01397</u>	QIMA Ltd	ZAF4	21862361	Lack of a transparent system in place for confidentially reporting and managing resolution of issues such as bribery corruption, and unethical business practices
Site Name	Audit Date	Audit Numb	er Comp Name	bany	Finding Number		Finding T	itle
Hatfield	17/11/2022	ZAA4216899		Ltd	ZAF421689972		performa	n to check the site's nce against compliance ents e.g. internal audits
Hatfield	17/11/2022	ZAA4216899		Ltd	ZAF421689978		are missir	ox available but content: ng / contents out of date /ise inadequate
Hatfield	17/11/2022	ZAA4216899		Ltd	ZAF421689982		No syster labour pr	n in place to monitor oviders

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Sedex for our suppliers

• Sedex registration for our supply chain is not mandatory: we are reviewing our position on this matter.

Tools and processes for due diligence

This is managed at Business Unit level and by department including Procurement, Quality and R&D.

Remediation via grievance mechanisms.

This is managed at Business Unit level

11. Reporting and KPIs

Disclaimer

Generally, policies and procedures are created by Business Units according to National employment law regulations requirement. EGC does not have a harmonised system for consolidation and reporting. KPIS reported at Group level are:



Quaterly reporting is done to Exponent as per their chosen KPIS.



12. Salary, remunerations

Freedom of association and collective bargaining

Freedom of association and collective bargaining are enabling rights, making it possible to promote and realize decent conditions at work. This is important to us.

The challenge of a Living Wage

The issue of a Living Wage is currently causing a great deal of debate. In recent years what a Living Wage is, how it should be calculated and whose responsibility it is have been the subject of much debate, with companies, NGOs and trade unions bringing different perspectives. The issue of in-kind benefits is also a subject of debate between companies, NGOs and trade unions. Civil society organizations argue that a basic wage should be a Living Wage, without depending on allowances, bonuses, in-kind benefits or overtime. Nevertheless research suggests that benefits can be of great importance to workers.

STAKEHOLDER	TYPICAL POSITION					
Companies	We meet our obligations under national law (which many of our competitors do not) and provide other benefits. How can we audit to a Living Wage when there is no agreed definition? Isn't it the governments' job to make sure a minimum wage is a Living Wage? We are under price pressure from our customers and our leverage is limited.					
NGOS	Workers tell us they cannot live on the wages provided and have no voice in the way they are set, particularly women. Yet multinational corporations make huge profits from their labour. The definitional challenge should not be an excuse for inaction; workers must get a fairer share of value from the value chain.					
Trade unions	A living wage is not just a number; the most sustainable basis to deliver it is through collective bargaining between management and workers, who know best what their basic needs are. Yet union freedoms are undermined by precarious work and corporate practices.					

How Evergreen Garden Care manages wages in relation to international principles

Evergreen Garden Care does not have a specific living wage policy for its own employees, but we state that 'Wages and working hours will, as a minimum, comply with all applicable wage and hour laws, and rules and regulations, including minimum wage, overtime and maximum hours in the country concerned'.

At global level there is a belief that people are Evergreen Garden Care's principal assets, and that it pays relatively highly: 'Our working assumption is that Evergreen Garden Care pays above the living wage in own operations, though this is difficult to quantify given the definitional challenges. We do ensure we pay above the minimum living wage.

Extra hours

This is managed in each Business Unit and sites as per local legislation. There is not corporate recommendation.



13. Corporate labour priorities

Evergreen Garden Care promotes a continuous improvement of the working conditions, giving special attention to the right of our employees to establish and join organizations of their own choosing and engage in constructive negotiations.

• Offer competitive wages and benefits that allow our employees to cover their needs according to local standards of living.

• Respect Corporate guidelines regarding "temporary employees" based on which temporary staff shall only be used in circumstances where it is justified by the temporary nature of the job and will not result in unjustifiable differences in employment conditions.

• Respect Corporate guidelines regarding "outsourced activities" which indicate that only those activities which are non-core to the business may be outsourced and that the people performing them will be treated fairly at all times.

• Implement the Corporate guidelines regarding working time for our employees to assure a safe and healthy workplace and a working environment respectful of their family lives.

• Treat every employee with dignity and without any tolerance for discrimination, harassment or abuse.

Collective dialogue and Unions

We ensure that direct and frequent communication is established at the workplace between management and our employees, both union members and non-union members. While dialogue with trade unions is essential, it does not replace the close relationship that our management shall maintain with our employees.

Regular dialogue with our employees and union representatives creates an opportunity to discuss matters of mutual concern and allows our employees to acquire a full understanding of the business activities and the objectives of Evergreen Garden Care.

In the spirit of continuous improvement, we encourage dialogue with our employees that goes beyond the traditional aspects of collective bargaining in order to share knowledge and to find jointly opportunities related to other important matters such as the health and safety at the workplace and our concern for the environment.

Evergreen Garden Care favours a policy of long-term employment. In the case that the closure or alienation of an Evergreen Garden Care operation is necessary, it will be handled with full respect to

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applicable legislation and our Corporate Business Principles. In such cases, employees and their representatives shall be informed within a reasonable timeframe and a social plan will be elaborated, taking into account the legitimate rights and interests of all concerned.

Collective negotiations

Evergreen Garden Care upholds the freedom of association of its employees and the effective recognition of the right to collectively bargain.

If collective negotiations take place, they will:

- be established within the legal framework of each country;
- be fair and constructive, based on the principle of good faith and an open exchange of information;
- relate to relevant working conditions such as wages, benefits and the exercise of union activities;

• focus on meeting common interests to improve further our competitive advantage such as the workplace environment.

Evergreen Garden Care and employee representatives are expected to make all necessary efforts to develop fair and constructive negotiations, overcome the difficulties that they might encounter, reach sustainable agreements and implement them.

14. What is Two-Way Communication?

Two-way communication is the process of sharing information back and forth between two parties. In other words, it's a conversation where both the sender and receiver invite and offer feedback. And most importantly, two-way communication is never a monologue.

How to Encourage Two-Way Communication in the Workplace

1. Picking the right communication channels (Google chats, Monkey surveys, ..)

2. Creating a culture of employee feedback

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Employee surveys and wellness check-ins are conducted on a regular basis. In addition, leaders and managers are encouraging feedback directly. This includes leaving time for Q&A during weekly stand ups and town halls.

Written leadership communications also end with a question and offer more opportunities for feedback.

3. Showing empathy and transparency

Use of plain, simple language across our internal communications. Use of smileys etc

4. Always acting on employee feedback

Acting on employee feedback is our most durable ways to encourage two-way communication. It shows your employees the value of their feedback and provides an incentive to speak up more often.

We recognize the value of employee feedback and share our plans to use it.

Examples of Two-Way Communication we use at Evergreen Garden Care

- 1. Interactive employee newsletters
- 2. Employee pulse surveys and anonymous questionnaires
- 3. Virtual town halls
- 4. Employee wellness check-ins

Employee surveys

Team member feedback is extremely valuable, and we provide several engagement methods, such as annual surveys, employee networks, and direct feedback, which help us understand and act upon employee concerns and expectations.

We conduct (annual) global satisfaction surveys to measure employee perspectives on culture, engagement, sustainability and wellbeing. The results of the last years were outstandingly positive showing progress in all areas and strong communication in a business that shows it can attract and retain employees. Senior leaders and each Business Units review these results and set up immediate actions plans which result in improvement in areas highlighted by our employees.

Social Business Cohesion

Evergreen Garden Care has developed its internal communication tool, to connect its employees across Business Units and better serve customers and gardeners. As we are limiting business travel as a good practice, to reduce costs and environmental impact, we have adopted measures to deliver all communications virtually.



Quality and efficient virtual communication tools, events and live streaming are making a difference. Internal engagement is higher and responses faster. People are experimenting and collaborating more, as well as sharing information and ideas, smoothing language differences across countries.

15. Careers

Cross functional career paths

Evergreen Garden Care has created new channels of cross functional career paths to enable individuals to progress in different business functions. This proves invaluable for business understanding and management as well as creating wider attractive career opportunities.

Work practices policies

We also recognise that our consumers have a legitimate interest in the company behind the brands and in the way Evergreen Garden Care operates. Our policies include:

Training and education for sustainable gardening

Each one of our Business Unit offers Training Academies for employees, customers and also tuition for gardeners. The training is delivered either in person, virtually, online or via podcasts. Each year we increase our technology and resources' investments, to offer more of our expertise to a more

Commented [A4]:

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connected audience. Our French and German Academies are Certified or validated by a third party.

Our Training academies present a competitive advantage as they enable products to be professionally presented to customers and consumers. It helps our Sales teams to provide appropriate answers to gardeners' increasing interest in sustainable benefits of our product range. The expansion of our digital tools with more material available and more online tuitions is an undeniable success, for our customers, around the world.

Training

At Evergreen Garden Care, it is important to give people the opportunities for life-long learning. All our employees can upgrade their skills, in an ever-changing world.

By offering them opportunities to develop, we enrich our knowledge within the business and we ensure the individuals are confident in their roles and the company. We also make them more employable to new positions across the functions and Business Units. The ultimate goal is to give our employees plenty of opportunities, throughout the organization, to enhance their knowledge each year.

On line workshops were readily available during the pandemic, ranging from operational subjects, as well as focusing on employees' health and well-being. They have enabled departments to use them as tools, for conversations and networking across teams, around a common theme. With Evergreen Garden Care internationals Training Academies, we estimate that 60% of our employees receive some form of training each year with 30% of the training at factory production level; 90% of the training is given by internal trainers, the rest by external providers.

17. Living healthier lives

Health and safety

There's nothing more important to us than the quality and safety of our garden products, along with the safety of our colleagues and supply chain partners.

As a global manufacturer, we are committed to providing a safe and healthy workplace for all employees and contractors working at our sites, while minimising the environmental footprint of our activities and products.

Our policy, with ISO 45001 and ISO14001 as driving management systems, is established by our H&S Manager, validated by our senior management, and signed off by our CEO.

KPIs, statistical analysis and continuous improvements are shared between our sites, worldwide. This helps guide the implementation of specific local or global preventive programs involving technical, organisational and people-based measures, learnings and training. Commented [A5]: Include the UK certification to ISO 45001 & ISO 14001 as the driving management system

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Our commitments to employees and communities wellbeing

As a global Garden Care business, we work every day to enable gardeners to create their own oasis of wellbeing.

Finding and attracting the right people who embrace this goal, is fundamental to our ability to influence the garden industry and move to advancing sustainable solutions at scale. We do this through a number of creative strategies, such as social media platforms, structured internship or apprenticeship programs, and talent attraction from non-traditional pathways.

We are then dedicated to retaining, and developing our team members across the enterprise. We strive to make our business a great place to work, now and in the future. Open communication, health and well-being are a priority, along with our LEAD behaviours.

Well being

Our vision for employee health and well-being is a key component of our overall HR business strategy. It provides targets related to physical activity, healthy eating and mental health, and for how those objectives should be monitored to measure progress and deliver improvements.

The increase in remote working associated with the COVID-19 pandemic is well known to have contributed to reduced physical activity. In turn, that reduction is known to impact mental health. In response, we now focus more on mental health, offering online training in topics covering physical activity, active breaks, sleep, relationships and parenting. We also mark World Mental Health Day with an entire week dedicated to the topic.

Quality of life and Wellbeing programms

We provide all eligible full- and part-time team members and their eligible dependents with a competitive benefits package consisting of holistic health care. Our benefits packages not only support team members and their families, but also contribute to stronger communities where our team members live and work.

A well-balanced, flexible workplace helps everyone feel more included because it shows that Evergreen Garden Care acknowledges and caters to individual needs and working styles.

Ways of working

Traditional employer-employee dynamics are no longer fit for either individuals or businesses. People are increasingly looking for more personally and professionally satisfying work. They want to move beyond the traditional 40-hour/40-week/40-year employment contract to something more flexible that's tailored to their needs and stage of life.

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Older and more experienced workers are increasingly choosing to work for longer; and younger people are after meaningful jobs with more flexibility. And Covid-19 forced us all to think differently about how and where we worked.

We are offering more flexibility in our work weeks with remote working offered when appropriate and adapted to the role.

Employee benefits

They may vary across Business Units. Employee health care is offered across the business.

Mental health programm

Our response to the pandemic with our IT and digital infrastructure

This extraordinary period has also been a time of growth. We were deeply impressed by the solidarity we felt between our employees, customers and partners. Our drive to stay up and running during these most challenging of times, received an extra boost through the motivation to help keep our customers going as well.

This was done through the fast delivery of required IT infrastructure, the installation of and training in collaboration solutions, the upgrading of needed security concepts, so that people could work from their homes in a secure and stable environment and the business as a whole could continue operating.

18. Proactiveness

Donations and aid

Our company may preserve a budget to make monetary donations. These donations will aim to support charities and community events.

Volunteering

Our company will encourage its employees to volunteer. They can volunteer through programs organized internally or externally. Our company may sponsor volunteering events from other organizations.

Supporting the community

Our company may initiate and support community investment and educational programs. For example, it may begin partnerships with vendors for constructing public buildings. It can provide support to nonprofit

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organizations or movements to promote cultural and economic development of global and local communities.

Family health and activities programm

Those are organised locally in each of our Business Unit and there is not Corporate recommendation. Health care is offered across regions to family members.

Charities initiatives

Our employees conduct charity initiatives to help make a difference in the wider community. Fundraising activities included quizzes, games, walks, sport events, food events. We also organise employee volunteering days.

Over 80KEuros has been invested in over 10 charity projects across Business Units for better lives in communities and we contributed to over 100 days of volunteering.

19. References

- United Nations Global Compact
- ISO26001 Guidance on social responsibility
- ISO 27701:2019
- Security techniques Extension to ISO/IEC 27001 and ISO/IEC 27002 for privacy information management — Requirements and guidelines
- ISO37301 Compliance management systems
- ISO 27001 Security techniques Extension to ISO/IEC 27001 and ISO/IEC 27002 for privacy information management

20. Abbreviations

- CBACollective bargaining agreementCoBPCode on Business PrinciplesETIEthical Trading Initiative
- FDI Foreign direct investment enterprise
- FMCG Fast Moving Consumer Goods
- IFC International Finance Corporation
- GRI Global Reporting Initiative
- ILO International Labour Organization
- ILLSA Institute of Labour Sciences and Social Affairs

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ISO IUF	IUF	International Organization for Standardization International Union of Food workers
	MNE Declarati on	Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
	MOLISA NCP	Ministry of Labour – Invalids and Social Affairs National Contact Point
	NGO	Non-government organization
	NMW	National minimum wage
	OECD	Organization for Economic Co-operation and Development
	POE	Privately-owned enterprise
	PPP	Purchasing Power Parity
	SAN	Sustainable Agriculture Network
	SEDEX	Supplier Ethical Data Exchange
	SMETA	SEDEX Methodology Ethical Trade Audit
	SOE	State-owned enterprise
	SOMO	Centre for Research on Multinational Corporations
	UNGP	UN Guiding Principles on Business and Human Rights
	UVN	Evergreen Garden Care Viet Nam
	VGCL	Viet Nam General Confederation of Labour
	WTO	World Trade Organization

Document revision tracker

This policy will be reviewed at the end of each financial year or in the event of material policy or business changes.

Document Type:	Standard	
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Revision Date	Revised By	Revision
June 2019	Beatrice Dosgheas	Change of format

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Oct 2020	BD	Addition of sections
Sept 2021	BD	Addition of employee benefits
Aug 2022	Beatrice Dosgheas	Addition with CSR report sections
November 22	Beatrice Dosgheas	Removed all carbon emissions paragraph and consolidated INTQ00068E NET ZERO The EGC contribution to stopping global warming Re naming and number of the document

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