

**PRODU©T**



# Human Rights Policy

Version 2021.9

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## INTRODUCTION (1/2)

We believe that business can only flourish in societies where human rights are protected and respected. We recognise that business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts.

This is an area of growing importance to our employees, workers, shareholders, investors, customers, consumers, the communities where we operate and civil society groups. There is therefore both a business and a moral case for ensuring that human rights are upheld across our operations and our value chain.

This Human Rights Policy contains over-arching principles which we embed into our policies and systems.

In line with the UN Guiding Principles on Business and Human Rights, we base our human rights policy commitment on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We follow the OECD Guidelines for Multinational Enterprises and are a founding signatory to the United Nations Global Compact.

We are committed to respecting all internationally recognised human rights as relevant to our operations.

Our principle is that where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.

PRODU©T's mission is to reduce our environmental footprint and increasing our positive social impact.

Our Code of Business Principles states that "the cooperation between PRODU©T and its Business Partners is based on a culture of trust, mutual respect, openness, a fair balance of reciprocal interests and equal opportunities and both parties understand that complying with applicable laws and safeguarding social and environmental standards are the foundation for a lasting and successful cooperation".

In our business dealings we expect our partners to adhere to business principles consistent with our own. We prohibit discrimination, forced, trafficked and child labour and are committed to safe and healthy working conditions and the dignity of the individual. Also the right to freedom of association and collective bargaining and effective information and consultation procedures.

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## INTRODUCTION (2/2)

We have a large and diverse extended supply chain and we recognise the critical role our suppliers play in helping us to source responsibly and sustainably.

Our Business principles sets out our expectations with regards responsible sourcing and manufacturing to the respect for the human rights, including labour rights, of the workers in our extended supply chain as well as diversity and equality.

We will only work with suppliers who have acknowledged and endorsed our Business Principles. They must agree to ensure transparency, to remedy any shortcomings, and to drive continuous improvement.

We understand that human rights due diligence is an ongoing process that requires particular attention at certain stages in our business activities, such as when we form new partnerships or our operating conditions change, as these changes may create new potential or actual impacts on human rights.

We recognise the importance of dialogue with our employees, workers and external stakeholders who are or could potentially be affected by our actions. We pay particular attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalisation and recognise that women and men may face different risks.

We place importance on the provision of effective remedy wherever human rights impacts occur through company-based grievance mechanisms. We continue to build the awareness and knowledge of our employees and workers on human rights, including labour rights, encouraging them to speak up, without retribution, about any concerns they may have, including through our grievance channels. We are committed to continue increasing the capacity of our management to effectively identify and respond to concerns. We also promote the provision of effective grievance mechanisms by our suppliers.

We continually evaluate and review how best to strengthen our approach to addressing human rights, including labour rights. We believe that working through external initiatives and partnerships, for example with other industry, NGO, trade union, supplier and other business partners, is often the best way to address shared challenges.

We will track and publicly report on progress on an annual basis and have these assessed and rated by independent organizations such as Ecovadis.

This Human Rights Policy consolidates our existing commitments and brings increased clarity on our processes and procedures. Its principles are implemented across our operations and value chain.

## 1. DISCRIMINATION & HARRASSMENT

PRODU©T is committed to providing an environment free of discrimination and harassment, where all individuals are treated with respect and dignity, can contribute fully, and have equal opportunities.

The purpose of this policy is:

- ✿ to identify the types of behaviour prohibited by this policy
- ✿ to provide procedures to follow when complaints of discrimination or harassment
- ✿ made by partners or employees of PRODU©T arise to ensure that all partners and employees of PRODU©T are aware that harassment and discrimination are unacceptable practices incompatible with our company standards, and or a violation of the applicable national or international laws

### 1.1 PROHIBITED CONDUCT:

PRODU©T upholds and supports the right to equal treatment without discrimination or harassment conform the UN Global Compact Principles. This Policy prohibits discrimination or harassment on the basis of the following grounds, and any combination of these grounds:

- Age
- Creed (includes religion)
- Sex (including pregnancy and breastfeeding)
- Gender Identity and Gender Expression
- Sexual Orientation
- Family status (such as a parent-child relationship)
- Marital status (including the status of being married, single, widowed, divorced, separated, or living in a conjugal relationship outside of marriage, whether in a same sex or opposite sex relationship)
- Disability (including mental, physical, developmental or learning disabilities)
- Race
- Ancestry
- Place of origin

Anyone at PRODU©T found to have engaged in conduct constituting Code-based discrimination and/or harassment may be subject to disciplinary action, up to and including termination. Based on the endorsement of our Business Principles, PRODU©T expects and or requires the same from its Business Partners.

## 1.2 DEFINITIONS

### Discrimination:

Refers to any form of unequal treatment based on a Code ground, whether imposing extra burdens or denying benefits. It may be intentional or unintentional. It may involve direct actions that are discriminatory on their face, or it may involve rules, practices or procedures that appear neutral, but have the effect of disadvantaging certain groups of people. Discrimination may take obvious forms, or it may occur in very subtle ways. In any case, even if there are many factors affecting a decision or action, if discrimination is one factor, that is a violation of this policy.

### Harassment:

engaging in a course of vexatious comment or conduct that is known, or ought reasonably to be known, to be unwelcome. It is directed at a person who identifies with the Code grounds listed above. It can involve words or actions that are known or should be known to be offensive, embarrassing, humiliating, demeaning, or unwelcome.

According to this definition of harassment, more than one event, or a "course of vexatious comment or conduct" must take place for there to be a violation. However, one incident could be significant or substantial enough to be interpreted as harassment.

## 1.3 REPORTING DISCRIMINATION AND OR HARRASSMENT

PRODU©T encourages the reporting of all incidents of harassment and discrimination, regardless of who the alleged offender(s) might be.

All employees have a right to freedom from reprisals or threat of reprisals for refusing to accept harassment in any form, for making a formal complaint or cooperating in an investigation.

Partners or employees can report incidents or complaints of Policy based discrimination and/or harassment verbally or in writing.

The report of the allegation(s) should include the following information:

- Name(s) of the person who has allegedly experienced Code-based discrimination and/or harassment and contact information
- Name of (any) alleged harasser(s), position and contact information (if known)
- Names of the witness(es) (if any) or other person(s) with relevant
- Details of what happened including date(s), frequency and location(s)
- of the alleged incident(s)
- Any supporting documents

An incident or a complaint of workplace harassment should be reported to the designated board member of PRODU©T as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated in a timely manner.

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## 1.4 COMMITMENT TO INVESTIGATE COMPLAINTS

PRODU©T will ensure that an investigation appropriate in the circumstances is conducted when any designated person at the workplace, manager or supervisor receives a complaint of workplace harassment. Complaints or incidents of workplace harassment will be investigated in a fair, respectful and timely manner.

The board will determine, who will conduct the investigation into the incident or complaint of workplace harassment. Depending on the allegations and the people involved, the investigation may be referred to an external investigator to conduct an impartial investigation.

## 1.5 TIMING AND RESULT OF THE INVESTIGATION

The investigation must be completed in a timely manner, generally within 90 days or less, unless there are extenuating circumstances (i.e. illness, complex investigation) warranting a longer investigation.

After an investigation is completed, the parties to a complaint may be informed in writing of the results of the investigation and any corrective action taken or will be taken by PRODU©T.

## 1.6 CONFIDENTIALITY

Information about complaints and incidents shall remain confidential. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect employees, to investigate the complaint or incident or to take corrective action or otherwise as required by applicable law.

## 1.7 ANNUAL TRAINING

Each year (at a minimum), PRODU©T will review this policy and provide training on this policy.

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## 2. ACCOMMODATION

PRODU©T commits to provide accommodation for needs related to the grounds of the Human Rights Policy, unless to do so would cause undue hardship.

The purpose of this Accommodation Policy and Procedure is to:

- ✦ Ensure that employees and partners at PRODU©T are aware of their rights and responsibilities under the global and local Human Rights principles with respect to accommodation;
- ✦ Set out in writing the organization's procedures for accommodation and the responsibilities of each of the parties to the accommodation process.

Accommodation will be provided in accordance with the principles of dignity, individualization, and inclusion. PRODU©T will work cooperatively, and in a spirit of respect, with all partners in the accommodation process and applies at all stages and to all aspects of the employment relationship, including recruitment and selection, promotions and transfers, and conditions of work such as hours of work and leaves of absence.

Requests for accommodation should be made to the management in writing and contain the grounds, reason, and specific needs. All requests will be taken seriously and no person will be penalised for making a request.

All information related to a request will be subject to the applicable privacy and confidentiality regulations. PRODU©T will maintain the confidentiality of information related to an accommodation request, and will only disclose this information with the consent of the person seeking accommodation. Persons requesting accommodation will be asked only for information required to establish the foundation of the accommodation request, and to respond appropriately to the accommodation request.

Where expert assistance is necessary in order to identify accommodation needs or potential solutions, the accommodation seeker is required to cooperate in obtaining that expert advice.

Failure to respond to such requests for information may delay the provision of accommodation.

Accommodation may take many forms, depending on the applicable Code ground. What works for one individual may not work for another. Each person's situation must be individually assessed. In each case, the organization must implement the most appropriate accommodation, short of undue hardship.

An accommodation will be appropriate where it results in equal opportunity to attain the same level of performance or to enjoy the same level of benefits and privileges experienced by others, and where it respects the principles of dignity, inclusion, and individualization.



The aim of accommodation is to remove barriers and ensure equality. Accommodations will be developed on an individualized basis. Appropriate accommodations may include:

- Modification of dress code (eg. due to creed)
- Leaves of absence (eg. for religious observance, pregnancy, disability, or family status)
- Changes to scheduling or hours of work (eg. due to pregnancy, creed, or family status)

Accommodation will be provided to the point of undue hardship. A determination regarding undue hardship will be based on an assessment of costs, outside sources of funding, and health and safety. It will be based on objective evidence.

A determination that an accommodation will create undue hardship may only be made by the designated management team member.

Where a determination is made that an accommodation would create undue hardship, the person requesting accommodation will be given written notice, including the reasons for the decision and the objective evidence relied upon.

### 3. ACCESSIBILITY STANDARDS

The purpose is ensure that employees, partners and applicants for employment at PRODU©T are aware of their rights and responsibilities of each of the parties to break down barriers and increase accessibility for persons with disabilities in the area of employment (among other areas) in line with applicable national and international legislation. PRODU©T shall provide individualized workplace emergency response information to employees who have a disability in accordance with the following elements:

- If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.
- If the employee who receives an individual workplace emergency response information requires assistance, and with the employee's consent, PRODU©T shall provide the workplace emergency information to the person designated by PRODU©T to provide assistance to the employee.
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability.
- Review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed, and when PRODU©T reviews its general emergency response policies.

PRODU©T will develop and have in place a written process for developing a documented individual accommodation plan for employees with a disability.



## 4. RETURN TO WORK

PRODU©T will have in place a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes shall be documented and must outline the steps that the PRODU©T will take to facilitate the return to work and include an individual accommodation plan.

## 5. PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT, ADVANCEMENT, REDEPLOYMENT

PRODU©T will take into account the accommodation needs and/or individual accommodation plans of employees when:

- using performance management processes
- providing career development and advancement information
- using redeployment procedures.

## 6. ENHANCING DIVERSITY AND INCLUSION IN RECRUITMENT, RETENTION, & ADVANCEMENT

PRODU©T is committed to establish and maintaining a diverse and inclusive workplace and at all stages and to all aspects of the employment cycle (recruitment, retention, advancement).

We commit to developing, implementing, and maintaining best practices and strategies to enhance equality, diversity and inclusion at PRODU©T.

PRODU©T measures and track recruitment, retention and advancement demographics (at least annually), to ensure that diversity and inclusion results maintain and or improve and report our results in our annual CSR report.

## 7. RESPONSIBILITIES OF EMPLOYEES AND BUSINESS PARTNERS

It is the responsibility of each employee and business partner to:

- Treat everyone in the workplace with dignity and in a manner that is respectful and free of violence, threats, discrimination, harassment, or intimidation
- Make changes to their own behaviour where they become aware that there is a potential for such behaviour to harm, intimidate, or threaten
- Cooperate in the investigation of any incident

It is the responsibility of PRODU©T management to:

- Assess and reduce risks of Human Rights non compliance risks
- Train employees to recognize Human Rights non compliance risks
- Cooperate with investigations