

## Inizio strives to act in accordance with internationally recognised human rights standards,

including the European Convention on Human Rights, the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the International Covenant on Economic, Social and Cultural Rights.

We work to guard against complicity with human rights violations and to uphold the human rights of our own workforce, our supply chain, our clients, and our communities.

### Our Commitment to Human Rights

This policy applies to all Inizio employees, contractors, and business partners. We also expect our suppliers to respect and adhere to this policy.

Where Inizio considers and ultimately participates in ventures as a non-controlling shareholder, we make the other shareholder(s) aware of the significance of this policy to us and encourage them to apply the same policy or a similar standard to the venture.

Inizio is completely opposed to slavery and human trafficking and will not knowingly support or conduct business with any organisation involved in such activities.

Where international human rights standards and local laws conflict, we will respect applicable laws while seeking to uphold the principles of internationally recognized standards. We aim to fully comply with applicable human rights legislation in the countries in which we operate.

### We will:

- a) seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner,
- b) seek to prevent or mitigate adverse human rights impacts that are directly related to our operations and services through our business relationships,
- c) provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts, and
- d) continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

---

## Our Policy

This policy establishes Inizio's position with respect to human rights and modern slavery and sits alongside our Codes of Conduct and Health & Safety Policy. Please also refer to our Anti-Modern Slavery Statement, to learn about the actions we have taken to uphold this policy most recently.

Our statements below draw upon the International Bill of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work:

- a) **Child Labour:** We will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships, internships and other similar programmes that comply with the applicable laws and regulations.
- b) **Modern Slavery:** We will not use forced, bonded or involuntary labour. We have a zero-tolerance approach towards human trafficking.
- c) **Health, Safety and Hygiene:** All of our employees will work in an environment that is both safe and healthy, in line with our Health & Safety Policy.
- d) **Freedom of Association and Employee Representation:** We respect the rights of our employees to form, join or not join a labour union, or other organisation of their choice, and to bargain collectively in support of their mutual interests without fear of punitive actions such as intimidation, harassment, or termination of employment.
- e) **Working Hours:** We will ensure that working hours are reasonable and comply with the law and industry standards.
- f) **Equality of Treatment:** We are fully committed to eliminating discrimination in recruitment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability, or social origin and to promoting equality of opportunity and treatment as outlined in our statements and policies on diversity, equity, and inclusion.
- g) **Employment Terms:** We will provide written and clear detail of the terms and conditions on which Inizio engages its employees. We will ensure that work performed by employees is on the basis of recognised employment law and practice.
- h) **Remuneration:** We will, at a minimum, provide wages and benefits that meet national standards. We are committed to equal pay and benefits for men and women for work of equal value.

## Reporting, Monitoring and Review

If an adverse human rights impact is identified, we will work with all parties involved to provide a remedy, compensation, and justice for the victim. We will also investigate the root cause so that we can take appropriate steps to prevent such an impact reoccurring.

Our confidential reporting program, detailed in our Codes of Conduct and Whistleblowing Policy, is available to all employees who see or encounter behaviour that concerns them. Third parties (including suppliers) can also telephone our helplines or contact Inizio's Confidential Reporting team.

The Inizio Board of Directors has overall responsibility for ensuring our commitment to human rights is put into practice and for the implementation of this policy.

The Deputy General Counsel has day-to-day responsibility for the implementation of this policy and for ensuring that any breaches are investigated.

All employees must be aware of and adhere to this policy and may be liable to disciplinary action in the event of failure to comply with the provisions of this policy or related policies and procedures.

We will periodically review this policy and provide information and/or training on any amendments.