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HUMAN RIGHTS FRAMEWORK POLICY

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1. Review History

Revision No.	Date	Cause for Review
00		Approval by the Board of Directors of Greening Group Global SA

2. Introduction

At GREENING we are committed to respecting and promoting human rights in all our operations and business relationships. We recognise our responsibility to act in an ethical and sustainable manner, and we adhere to international human rights principles, including the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

3. Scope of application and validity


This Policy shall apply to all companies in the Greening Group in any country, which are directly or indirectly owned by Greening Group Global, SA as parent company, as well as to all those that may join it in the future, (all of which are collectively referred to as "**GREENING**").

In addition, this Policy is also applicable, where appropriate, to joint ventures, temporary joint ventures and other equivalent associations, when one of the GREENING member companies assumes their management.

Likewise, it shall also be applied by all persons who make up GREENING, (among others, its employees, managers, directors and persons related to them, hereinafter "**Staff**") as well as those others who collaborate and/or have relations of any kind with GREENING (including, but not limited to, its clients, suppliers, business partners, third parties and/or any other collaborators who provide services to the Group and/or with whom it has commercial and/or similar relations, all broadly referred to as "**Third Parties**" or "**Collaborators**").

This Policy constitutes the framework of reference for the Policies and Protocols of the existing Human Rights Compliance Programme at GREENING, which is known by all the Staff and promoted by the Board of Directors.

This Policy shall come into force as soon as it is approved by the Board of Directors of the parent company, and shall remain in force for an indefinite period, without prejudice to its approval by the Board of Directors.

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may be modified or revised according to the needs of GREENING, the social reality and the applicable legislation at any given time.

In this regard, this Policy will be published through the following channels:

(i) Intranet; (ii) Mass email communication; and (iii) Placement on the Corporate Sharepoint in accordance with the Compliance Policy Protocol.

4. Principles

- **Respect for Human Rights:** GREENING is committed to respecting the human rights of all staff and third parties: the right to life, liberty and security, equality, freedom of expression, education and health.
- **Diversity, inclusion and non-discrimination:** at GREENING we promote equal opportunities and prohibit any form of discrimination based on race, gender, sexual orientation, religion, disability, age or any other protected status.
- **Fair Working Conditions:** We guarantee fair wages commensurate with the functions performed and the number of hours worked, ensuring that payments are made regularly, on time and directly, taking into account national legislation on remuneration, working hours, overtime and social security. In this regard, rules on working hours, breaks and remuneration should be communicated to workers in an accessible and understandable manner.
- **Right to freedom of association and collective bargaining:** to promote and protect the free exercise of trade union freedom and the right of association of workers, respecting their freedom to form, join, form or belong to trade unions.
- **Eradication of Child Labour:** We promote safe adolescence and childhood by rejecting all forms of child labour and/or slavery.
- **Exclusion of Forced Labour, Slavery and Human Trafficking:** We reject forced or compulsory labour, slavery (including practices associated with modern slavery), servitude and human trafficking, and minimise any risk in the Group's operations and its chain of activities.
- **Health and safety of workers:** to provide workers with the necessary personal protective equipment and a safe working environment in which employees can carry out their work in the best possible conditions of health and safety at work. The measures and policies for the prevention of occupational risks at all levels of the activity must be known by the workers, respecting the applicable regulations. Likewise, a zero accident rate will be pursued. These occupational well-being requirements must also be understood from the point of view of employees' mental health. In order to mitigate the effects of health incidents, GREENING will be encouraged to be informed of them.

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- **Digital disconnection:** at GREENING we encourage the conciliation between personal and working life as well as the development of actions that seek the physical and emotional wellbeing of all our staff.
- **Equal Opportunities:** Encourage the professional and personal growth of all GREENING employees, guaranteeing equal opportunities through appropriate policies. The selection and promotion of employees must be based on objective criteria of merit and ability.
- **Education and Training:** Implement training programmes that facilitate the training and specialisation of employees, enabling them to perform their tasks safely, develop professionally and adapt to the various demands of their work. In addition, these programmes should inform them of their rights and responsibilities in terms of human rights in the work environment.

5. GREENING and Third Party Commitment

GREENING undertakes to include in its contracts with Third Parties or Collaborators a contractual clause whereby it has sufficient measures for the prevention, management and mitigation of the commission of any type of conduct that could involve a violation of the human rights set out in the United Nations Universal Declaration of Human Rights, committed with the means or under the cover of the company itself and/or through any natural person who is a member or dependent of the company.


All Third Parties must state that they are aware of GREENING's Human Rights Policy (published on the corporate website <https://www.greening-group.com/>) and undertake to respect it and to apply its provisions in the operation of the [object of the business relationship] and to report any irregularity in compliance with them through GREENING's Whistleblower Channel, available on the corporate website.

Likewise, in the event that the Third Party subcontracts part of the activities that are the object of the commercial relationship, it shall, in turn, ensure that said subcontractors comply with the provisions of this contract, as well as with the rest of GREENING's rules that, where applicable, may be applicable to them.

6. Communication through the Whistleblowing Channel

GREENING Personnel who become aware of any fact or that there are indications that any conduct is being carried out that may constitute a breach of this Policy have the duty to inform the Compliance Body as soon as possible, using the company's Whistleblowing Channel for this purpose.

Such communications shall be absolutely confidential and shall not cause any prejudice to any person who, acting in good faith, has reported any such conduct.

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which, in their view, could be contrary to the good practices set out in this document.

It should also be added that, during the investigation process carried out by the Compliance Body, Staff are obliged to cooperate by making available all relevant information and providing interviews if necessary.

GREENING Staff may also inform the Compliance Officer of situations that raise doubts as to whether or not they actually involve a violation of the provisions of Human Rights Framework Policy. These doubts should be raised through the e-mail address compliance@greening-group.com for resolution.