

Distribution
All Eltel companies

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HUMAN AND LABOUR RIGHTS POLICY

1 PURPOSE

This policy describes Eltel's human and labour rights commitment. We expect our employees, suppliers, customers, and other business partners to fully respect human and labour rights without exception.

2 APPLICABILITY AND SCOPE

This policy applies to all entities and employees of the Eltel Group.

3 POLICY STATEMENT

Eltel is committed to respecting and endorsing internationally recognized labour and human rights standards including those set out in the:

- International Bill of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- Basic labour rights as defined by the International Labour Organization including the ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises

As a signatory to the United Nations Global Compact and its ten principles, Eltel respects and supports human and labour rights across our entire supply chain, including our own operations, suppliers, customers, end-customers and other business partners. We continuously improve our understanding of human rights impacts and take steps to remediate the impacts we become aware of.

Eltel does not engage in any projects where any violation of affected communities has been reported, observed or is in question.

Eltel is committed to ensuring that any abuses are reported and investigated. If any employee, supplier or business partner witnesses or has knowledge of incidents violating this Human Rights policy, the Eltel Code of Conduct or any applicable law or regulation, they are encouraged to report the incident or alleged violation through the

Whistleblowing Channel. For more details regarding whistleblowing please refer to the Whistleblowing policy.

4 HUMAN RIGHTS DUE DILIGENCE

Eltel's human rights due diligence approach is based on the UN Guiding Principles on Business and Human Rights and follows the six steps outlined in the OECD Guidelines for Multinational Enterprises.

Eltel is committed to ensuring that human rights are an embedded part of our business conduct, policies and management systems. We aim to identify, assess and prioritize human rights impacts throughout our business and in doing so aim to continuously prevent and mitigate potential impacts.

Human rights due diligence is an ongoing process where risks and impacts are assessed continuously as part of various processes, such as country and group risk assessments as well as customer and supplier risk evaluations.

We use various metrics to track the implementation of the due diligence processes and measures taken in line with our Human Rights Due Diligence framework.

Eltel's Annual Report is our main channel of external communication regarding actions taken during the year.

4.1 Eltel's salient human rights

Health and Safety in the workplace is Eltel's top priority. As part of Eltel's risk assessment processes, Eltel has identified that the health and safety of our personnel as well as the personnel of our suppliers and customers is our main area of focus in terms of our salient human rights risks.

Eltel is committed to focusing on human rights that are at risk of the most severe negative impact and that are the most relevant to our industry and business operations.

For further information please refer to the HSSEQ policy.

5 LABOUR RIGHTS

Eltel is committed to ensuring respect for the labour rights of our employees as well as the personnel of our suppliers.

5.1 Discrimination, harassment and bullying

Eltel is committed to maintaining a work environment where everyone feels physically and psychologically safe. We do not tolerate any type of discrimination, harassment or bullying. We are committed to assuring the equitable treatment of all individuals regardless of any personal attributes or characteristics.

For further information please refer to the Human Resource and Diversity policy.

5.2 Child and forced labour

Eltel has zero tolerance towards child labour, forced labour, abuse and exploitation throughout our operations and value chain. Eltel does not tolerate, in any form or context, the use of servitude, human trafficking, or slavery, in its operations or in any part of our global supply chain. Eltel is fully committed to respecting and supporting children's rights, based on the UN Global Compact Children's Rights and Business Principles.

5.3 Freedom of Association and collective bargaining

Eltel respects our employees' right to freely associate and bargain collectively. Our employees have the right to be represented in order to pursue legitimate interests, to form and join trade unions of their choosing, to bargain collectively and have access to internal and/or external employee representatives.

Eltel is committed to facilitating discussions and negotiations with employee and/or trade union representatives as well as providing these representatives with required information as per local laws and regulations. Eltel does not interfere in the operations of such representative bodies.

5.4 Working conditions

We adhere to all applicable local laws, relevant ILO conventions and industry standards with respect to working hours, wages, benefits, overtime and access to WASH facilities. We strive to keep our operations free of industrial injuries, customer complaints and with minimum environmental impact and security breaches.

For further information please refer to the HSSEQ policy.

6 RESPONSIBILITIES

The responsibilities for this policy follows the general rules set in the 'Policy over Policies'.

7 EXCEPTIONS

There are no exceptions to this policy.

8 REFERENCES TO ASSOCIATED POLICIES

Code of Conduct

HSSEQ Policy

General Counsel

22.12.2023

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Human Resource and Diversity Policy

Whistleblowing policy

Anti-Bribery and Anti-Corruption Policy

Environmental Policy

Data Protection Policy

HR Data Protection Policy

Human Rights Due Diligence Framework