Ammega Global Human Rights Policy

1. INTRODUCTION
Ammega is a leading and sustainable conveyor and power transmission belt manufacturer. Our locations are spread over 40 countries, the Group counts more than 6,000 employees, 20 manufacturing sites and a worldwide distribution and servicing network across 150 countries.

This Ammega Human Rights Policy articulates our responsibility to respect all human rights in line with the UN Guiding Principles on business and human rights (the UNGPs). The Policy focuses on those areas that have been identified as priorities for our industry.

The Policy is derived from:

- The United Nations (UN) Universal Declaration of Human Rights and the two International Covenants making up the International Bill of Human Rights;
- The International Labour Organisation’s (ILO) Declaration of Fundamental Principles and Rights at Work; and
- The United Nations Global Compact.

For the purposes of this Policy, the above-mentioned documents will be called the “International Human Rights Declarations”.

2. PURPOSE
The Ammega Human Rights Policy sets out principles for our actions and our behavior in relation to human rights. It constitutes a key element of the compliance framework and road-map of the Ammega Group.

Over time, the Policy and its associated practices are expected to become second nature to all employees and stakeholders as Ammega’s operating procedures create an environment where human rights are fully respected and we do not engage in any activities that directly or indirectly violate human rights.
3. SCOPE

This Policy applies to all employees of Ammega subsidiaries and affiliates worldwide. In addition, all contractors working at our sites are expected to comply with this Policy. We will promote its principles to both our contractors and suppliers through our Responsible Sourcing Policy, by driving forward industry-based social and environmental standards and by engaging with joint venture partners on these issues.

The Ammega Human Rights Policy brings together and complements the support for human rights found in other company policies and guidelines, including:

- Code of Conduct
- Environmental Policy
- Health & Safety Policy
- Human Resources Policies
- Anti-Harassment Policy and Procedure
- Anti-Corruption Policy

In implementing this Policy, we are subject to the laws of the countries in which we operate and are committed to comply with all such applicable laws in the respective countries.

Where our Policy, procedures and external commitments are more stringent than local laws, we will operate in accordance with our standards. In situations where local law is less stringent than the International Human Rights Declarations, we will endeavor to develop a response on a case-by-case basis while using our Policy as a guideline. Where local law prohibits us from upholding certain aspects of this Policy, we will comply with these local laws while seeking nonetheless to uphold and respect human rights.

4. SPECIFIC COMMITMENTS AND PROVISIONS

4.1. Commitments to Stakeholders

We are committed to respect human rights of all our employees. We will develop our employment policies with the aim of achieving uniform worldwide application of the relevant aspects contained in the International Human Rights Declarations.

We will remain committed to train our employees to be aware of and respect
human rights in the workplace and in those local communities directly affected by our operations. For business partners, we will respect and promote human rights when engaging with contractors, suppliers, customers, joint venture, and other partners. We will do this, as appropriate, through proactive engagement, monitoring, certification and contractual provisions.

Suppliers, operating in or procuring from areas where we’ve identified severe risks, will be the key focus of this engagement.

For local communities, we seek to respect the human rights of those who might be affected by our company actions and to develop an understanding of the cultures, customs and values that prevail in their communities by creating and maintaining an inclusive and open dialogue with them.

4.2. Specific Provisions

4.2.1. Health and Safety

Promoting Health and Safety

Ammega is committed to fostering general wellbeing in the workplace and to the goal of zero workplace accidents or injuries. These aims are in line with those of our Health and Safety Policy and Procedures, which promote our commitment to safety at work place.

4.2.2. Labour

Promoting Freedom of Association

Ammega upholds freedom of association and the effective recognition of the right to collective bargaining. We also work with our contractors and suppliers to promote the achievement of this principle.

4.2.3. Eliminating Forced or Compulsory Labour, Human Trafficking and All Forms of Modern Slavery

Ammega opposes the use of forced or compulsory labour, human trafficking and all forms of modern slavery, both within its own operations and
throughout its supply chain. We will undertake efforts with our contractors and suppliers, including due diligence within our supply chains, to avoid indirectly benefitting from or promoting such illegal practices.

4.2.4. Abolishing Child Labour
Ammega opposes the use of child labour. We will work in collaboration with contractors and suppliers to prevent or end any instances of child labour in a manner that is consistent with the best interests of the child.

4.2.5. Eliminating Unlawful Discrimination, Harassment and Violence in the Workplace
Ammega is committed to ensure that each employee and potential employee is treated with fairness and dignity.

Ammega strictly forbids any acts of violence against or harassment of any employee, vendor, contractor or third party on the basis of an individual’s national origin, religion, age, race, mental or physical disability, sex, colour, pregnancy, childbirth or related medical conditions, order of protection status, marital status, sexual orientation (including gender identity, gender non-conformity, gender expression and status as a transgender or transsexual individual) political affiliation or any other characteristic protected under applicable federal, state or local law.

Ammega seeks to provide each employee with an equal opportunity for advancement without discrimination.

4.2.6. Providing Competitive Compensation and Remuneration
Ammega aims to pay competitive wages based on local market assessments and Compensation & Benefit standards in order to build a strong framework of pay structure for the organization and create a competitive work environment for its employees.
4.2.7. Upholding Conditions of Employment
Ammega complies with all laws regarding conditions of employment, including basic and over-time working hours, and will, where applicable, abide by all agreements negotiated with our employee representatives.

4.2.8. Local Communities

Avoiding Involuntary Resettlements
Ammega seeks to avoid involuntary resettlements. In situations where it is unavoidable, we are committed to comply with the national governments’ or regional authorities’ guidelines on resettlement and rehabilitation, and we’re also committed to acting in line with international human rights norms, including the International Finance Corporation Performance Standards, on this subject.

Respecting Indigenous Peoples’ Rights
Ammega respects the rights of Indigenous Peoples as defined by applicable national and emerging international standards.

4.2.9. Adopting Proportionate Security Arrangements
Ammega aims to ensure that the provision of security to our operations and our engagement with public and private security forces is consistent with the laws of the relevant country and relevant international standards and guidelines, such as the Voluntary Principles on Security and Human Rights. We will adapt our security arrangements to balance the need for safety while also respecting human rights.
4.2.10. Developing Practices for Land and Water Use
Ammega works towards understanding and applying sound practices for land and water use consistent with emerging international practices while also respecting human rights and complying with Ammega Environmental Policy.

4.3. Governance and Accountability
Responsibility for the implementation of this Policy lies with the most senior manager responsible for each business segment, country and/or location, and for our centralized procurement system. These executives will report to the CEO and CHR&CO on any human rights issues arising within our operations or our supply chain within 24 hours of becoming aware of these issues.

4.4. Confidentiality
Ensuring Confidentiality of Complaints
Ammega is committed to take action to ensure observance of this Policy. Persons becoming victims of or witnesses to non-compliance with the principles laid down in this Policy may raise their concerns to their manager and/or their local HR Manager, or alternatively, in a confidential manner using our internal SpeakUp tool. Complaints suggesting any violation of this Policy will be treated with the utmost confidentiality. In line with our SpeakUp Policy, information relating to complaints will be disclosed, for the purpose of investigation, to employees or third parties on a strictly “need-to-know” basis.

4.5. Consequences of Violating the Policy
Violations of this Policy may subject the person involved to disciplinary actions and other consequences prescribed by law. The disciplinary process, including the investigation, shall be fair, impartial and transparent. Based on the conclusions, Ammega will take appropriate actions, may cooperate with authorities and may commence, where appropriate, legal actions against employees found guilty of inappropriate behavior covered by the Policy.
5. IMPLEMENTATION

Ammega’s implementation of this Human Rights Policy will take place through internal audit procedures. Implementation will be supported by Business Operations, Procurement, Human Resources & Communication, Internal Audit, Legal & Compliance and Health & Safety functions.

If employees become aware of human rights issues within our operations or supply chain, they should inform the manager responsible for the relevant business or site as soon as possible and share this information where it’s needed within the company.

This Policy is an overarching statement affecting other standards and procedures – such as Ammega Responsible Sourcing Policy to address, as necessary, specific human rights matters.

This Policy is endorsed by the Ammega CHR& CO, and every effort will be made to communicate it as widely as possible within the company and among Ammega’s stakeholders.

6. REPORTING

The company will, when needed, publicly report on the performance of these processes.

7. REVIEW AND MONITORING

Ammega will periodically review the Policy and our implementation with respect to its suitability and effectiveness.

5 December 2022