

## BENOLI TECH's human rights and working conditions policy

All managers, employees and business partners are expected to comply with applicable laws and other relevant regulations in Germany and abroad in all company-related decisions and actions. In the context of this document, particular attention is paid to human rights and working conditions. Human rights are generally considered to be those rights that come into force simply by virtue of being human. They serve to uphold the dignity of every human being and are independent of nationality, origin, gender, skin color or other status. Management and executives honor these rights of all employees and treat them with the appropriate high level of respect. Maintaining the social integrity of our company and an excellent work environment are recognized by BENOLI TECH as an essential component of sustainable business success.

### **1. Principles**

BENOLI TECH complies with all applicable laws and regulations and other relevant provisions in Romania and abroad. The company rejects any kind of corruption, forced labor, child labor or discrimination based on race, nationality, gender, sexual orientation, religion, political orientation, impairment, or age. The management, each manager and each individual employee is responsible to:

- Comply with laws, regulations, and BENOLI TECH's internal policies, including core ethical values.
- Know BENOLI TECH's values, policies, management system and common business practices in the respective area of responsibility and apply them diligently to the best of their abilities.
- Comply with occupational safety and environmental laws, policies, and regulations.
- Work as part of a team and contribute to the best of their ability to achieve common goals.
- Contribute to a working environment in which trust, appreciation, commitment, and respect are fostered.
- Always act in good faith, responsibly, with reasonable care and competence, and without misrepresenting facts.
- Act objectively, but without subordinating personal judgment.
- Protect the assets, corporate goods (tangible or intangible) and resources of the companies and to promote their efficient use, as well as to take appropriate organizational precautions that exclude any liability on the part of BENOLI TECH.
- No employee may make inappropriate use of the assets and resources of BENOLI TECH or make them available to third parties

### **2. Human Rights and Working Conditions**

In accordance with national and international regulations, BENOLI TECH perceives human rights as inviolable and manages working conditions accordingly, so that no impairment of human dignity is to be expected at the workplace. The company's employees are considered equal regardless of any attributes, which is presented in the following subchapters.

#### **a. Ethical recruiting**

BENOLI TECH recruitment system has as principle hiring workers lawfully and in a fair and transparent manner that respects and protects their rights.

Our guiding principles in the recruitment process are:

- A. Respect for Laws, Fundamental Principles and Rights at Work
- B. Respect for Ethical and Professional Conduct
- C. Prohibition of Recruitment Fees to Jobseekers
- D. Respect for Freedom of Movement
- E. Respect for Transparency of Terms and Conditions of Employment
- F. Respect for Confidentiality and Data Protection
- G. Respect for Access to Remedy

**b. Working Hours and Time**

The hours to be worked are agreed upon together with the employee during the hiring process and in any case comply with the Working Hours Act. Seasonal peaks in work may require that the number of hours worked be increased. These additional working hours on a voluntary basis are either remunerated to the employee or he/she is given the opportunity to compensate for them in a timely manner, after the order volume has been reduced, by means of compensatory time. Flexible working hours to support a balance between work and private life are in place across all departments. Sufficient rest time for regeneration between workdays is ensured via core working hours. In addition, weekends are generally considered non-working time, but can still be used to reduce high order volumes at the express request of the employee. This additional working time on days off is recorded and remunerated as overtime.

**c. Occupational Safety**

Occupational safety is ensured at BENOLI TECH by means of internal training and advanced training. For this purpose, BENOLI TECH has developed an independent guideline. To cope with acute situations, emergency plans are defined in the company and fire protection officers and first aiders are trained.

**d. Wages and Benefits**

The wage and salary structure at BENOLI TECH is adapted to the qualifications and experience of the employees. All salaries exceed the legal minimum wage. In addition, special leave days are granted by the employer due to weighty events (for example, relocation and deaths in the immediate circle). Sick leave is fully compensated by the company for up to six weeks. Suppliers are encouraged to consider appropriate wages and social benefits.

**e. Forced Labor**

In the company, any form of forced labor is prevented through transparent communication of the activities expected by the employer. As early as the planning stage, the activities of the position to be filled are defined in a job profile and the resulting requirements are published in the advertisement. In this process, possible psychological factors resulting from under-, or overstraining are considered, and the scope of duties is adapted accordingly to the required level of education and skills of a potential, future employee. During the interviews, these are presented to the applicant by the department heads who are present at the appointment. Thus, it is up to the employee to evaluate a position with the associated activities for personal suitability and ultimately agree. In the course of the employment relationship, the employee is free to refer to his employment contract

and the scope of activities defined in it. In this case, the human resources department decides whether a claimed activity is incompatible with the contract.

**f. Child Labor and Young Workers**

The employment ban on children applies throughout the company.

**g. Harassment**

Inhumane treatment, such as physical abuse or sexual harassment and abuse are subject to a zero-tolerance strategy in the company. All conspicuous acts, even the threat of harassment, are punished in every case up to and including summary dismissal. This also includes insults, psychological and physical coercion, and any form of corporal punishment.

**h. Anti-Discrimination**

The zero-tolerance strategy also applies to discrimination against employees based on their skin color, religion, gender, sexual orientation, ethnic or social origin, race, skin color, language, age, and social status. Equal treatment of all people in the company is a prerequisite.

\* For reasons of better readability, the simultaneous use of the language forms male, female and diverse (m/f/d) in the text is waived. All references to persons apply equally to all genders.

**i. Freedom of association**

BENOLI Tech's employees have the right to join or leave groups voluntarily, the right to take collective action to pursue their interests or the ones of the group they belong to, and the right to accept or decline membership based on certain criteria.

**j. Collective bargaining policy**

According to the current legislation, employees have the right to voluntarily join a collective bargaining action to formalize the discussions between BENOLI Tech and employees' representatives. BENOLI tech encourages open dialogue and improvement suggestions.

**k. Land, forest and water rights**

BENOLI TECH and its suppliers recognize that land, forest and water rights is a cross-cutting issue that impacts directly on the enjoyment of a number of human rights. For many people, land is a source of livelihood, and is central to economic rights. Land is also often linked to peoples' identities, and so is tied to social and cultural rights. Our company's activities do not affect land and people's rights on it. Our activities are limited to office work, therefore its impact on land, water and forest rights is evaluated as minimum. However, we strongly encourage our employees and suppliers to acknowledge the matter and to take appropriate action if necessary.

The human rights aspects of land affect a range of issues including:

- poverty reduction and development,
- peacebuilding,
- humanitarian assistance,
- disaster prevention and recovery, and
- urban and rural planning.

We acknowledge that food insecurity, climate change and rapid urbanization have also refocused attention on how land is being used, controlled and managed by States and private actors.

Failure to effectively prevent and mitigate environmental degradation and the negative impact of climate change could drastically reduce access to land, especially for marginalized groups.

## **I. Forced eviction**

Forced eviction for millions of people around the world results in their being homeless, landless, or living in extreme poverty and destitution.

BENOLI TECH, along with its suppliers, should not have any influence on the eviction of people living in the surroundings of the companies' location.

### **m. Use of private or public security forces**

Good practice regarding the use of security forces is based on the concept that providing security and respecting human rights can and should be consistent. This translates into implementation of policies and practices that ensure security provision is carried out responsibly, with any response being proportional to the threat. Proactive communication, community engagement, and grievance redress are central to this approach, often through collaboration between security and community relations departments. Gender considerations are also important, as women often have different experiences and interactions with security personnel. Companies have a responsibility to ensure proper hiring, training, rules of conduct, and supervision of private security personnel. They should also encourage public security personnel to use proper restraint when responding to situations related to the project.

BENOLI TECH has no direct private security forces as suppliers, however, we encourage the suppliers benefiting from this kind of service to pay close attention to the considerations above.