

HUMAN RIGHTS POLICY

Valid for:	Raben Group companies and their business partners		
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1. AIM OF THE POLICY

The aim of the policy is to demonstrate our commitment to respect human rights and ensure that this commitment is embedded across all our operations and across supply chain. It also reinforces existing policies, instructions, guidelines processes and activities that address human rights issues. The policy outlines an effective human rights governance structure and procedures, including but not limited to conducting human rights due diligence and ensuring compliance with international human rights standards in business. It also aims to foster awareness of human rights within the Raben Group and the supply chain.

2. DEFINITIONS AND ABBREVIATIONS

Term	Meaning
Affected stakeholder(s)	An individual or group of people (within and outside the Raben Group) whose rights have been or might be affected by a company's operations, products or services.
Business partners	All entities that the company engages within its operations, including suppliers, contractors, and transport subcontractors, vendors, and consultants.
Grievance mechanism	This term is used to indicate any routinized, State-based or non-State-based, judicial or non-judicial process through which grievances concerning business-related human rights abuse can be raised and remedy can be sought (<i>Guiding Principles on Business and Human Rights</i>)
Human rights due diligence process	An ongoing risk management process that needs to be followed to identify, prevent, mitigate and address adverse impacts on human rights. The process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.
International Bill of Human Rights	International Bill of Human Rights integrates all together: <ul style="list-style-type: none"> • The Universal Declaration of Human Rights, • The International Covenant on Economic, Social and Cultural Rights, • The International Covenant on Civil and Political Rights and its two Optional Protocols
ILO Declaration on Fundamental Principles and Rights at Work.	The ILO Declaration on Fundamental Principles and Rights at Work, adopted in 1998 and revised in 2022, represents the commitment of governments, employers' organizations, and workers to uphold core human values that are essential for social and economic life. It confirms the obligations and commitments inherent in ILO membership, which include: <ul style="list-style-type: none"> • freedom of association and the effective recognition of the right to collective bargaining; • elimination of all forms of forced or compulsory labour; • effective abolition of child labour; • elimination of discrimination in respect of employment and occupation; • provision of a safe and healthy working environment. (https://www.ilo.org/ilo-declaration-fundamental-principles-and-rights-work)

Raben Group	All Raben Group subsidiaries, of which Raben Group N.V. is the parent company.
Remedy	Refers to both the process of providing remedy for a negative human rights impact and the substantive outcomes that can counteract, or make good, the negative impact. These outcomes may take a range of forms such as apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, instructions or guarantees of non-repetition.
Salient (significant) Human Rights Issues	Those human rights that are at risk of the most severe negative impacts through a company’s activities or business relationships. They therefore vary from company to company.
Severe negative human rights impact	A negative human rights impact that is severe by virtue of one or more of the following characteristics: its scale, scope or irremediability. Scale means the gravity of the impact on the human right(s). Scope means the number of individuals that are or could be affected. Irremediability means the ease or otherwise with which those impacted could be restored to their prior enjoyment of the right(s).
Abbreviations	
BHR	Business and human rights
CFO	Chef Financial Officer of Raben Group N.V.
ILO	The International Labour Organization
OECD	The Organisation for Economic Co-operation and Development
UN	The United Nations, an international organization founded in 1945.

3. SCOPE

In scope	Out of scope
<p>All Raben Group companies and their employees, including but not limited to the senior executives, members of the Supervisory Board, Raben Group Board, self-employed (contractors), interns and apprentices at every site Raben Group operate.</p> <p>Business partners and their personnel.</p> <p>Entities with a Business relationship with the Raben Group and its employees.</p>	Not applicable

4. ROLES AND RESPONSIBILITIES

Role	Responsibility
CFO	<ul style="list-style-type: none"> To ensure effective management of respect for human and labour rights, CFO is responsible for overseeing the implementation and compliance with the Raben Group Human Rights Policy CFO is also responsible for reporting on human rights and labour rights matters to the Management Board.
Risk Director	<ul style="list-style-type: none"> Risk Director, who also serves as the Group Human Rights Officer on behalf of the CFO, is responsible for the ongoing management of human rights and labour rights issues, as well as other topics covered by human and labour rights standards.
Group Human Rights Officer	<ul style="list-style-type: none"> Group Human Rights Officer is responsible for developing and managing the implementation of the internal due diligence process Also cooperates with the stakeholders who may have an impact on the respect of human and labour rights in the company and entire chain of activities.
Management Board	<ul style="list-style-type: none"> The Management Board conducts an annual review of the company's human and labour rights impact and risk assessment. This review involves evaluating the effectiveness of existing policies, assessing any new risks, and ensuring that corrective actions are taken as necessary to address identified issues. The Board also ensures that adequate resources are allocated to support human rights and labour rights actions.
Statutory Boards of Raben Group subsidiaries	<ul style="list-style-type: none"> Statutory Boards of Raben Group subsidiaries are responsible for ensuring compliance with national supply chain due diligence regulations and managing the implementation of the Raben Group due diligence standard.
Employees	<ul style="list-style-type: none"> Follow all rules, procedures, and guidelines derived from this Policy. Actively contribute to the company's human rights objectives through responsible behavior. Report any human rights concerns through established internal reporting channels (e.g. whistleblowing platform). Participate in training and initiatives aimed at increasing human rights awareness.
Suppliers, contractors and other business partners	<ul style="list-style-type: none"> Are expected to comply with the human rights-related requirements set by the Raben Group. Shall follow applicable legal regulations, standards, and contractual obligations related to human rights.

5. POLICY STATEMENTS

5.1. Coverage of the policy

5.1.1. The Human Rights Policy applies to all Raben Group companies and their employees in different positions, regardless of the type of contracts and roles within the organization.

5.1.2. We believe that business partnerships are based on shared values and all enterprises have the same responsibility to respect human rights as they conduct their business, irrespective of size, location, sector, or type of operations. Consequently, the Human Rights Policy applies to all our business partners, irrespective of the type of business relationship they have with the Raben Group.

5.2. General statement of human rights commitments

5.2.1. We share the belief that human rights are universal, indivisible, interdependent and interrelated and that all people have the right to be treated with dignity and respect, regardless of, among other, their gender, race, disabilities, place of birth, place of residence, ethnic or social background.

5.2.2. We recognize that respecting human rights and labour standards within the entire supply chain is not only an aspiration, but is an integral part of every business operation.

5.2.3. We are committed to respecting human rights and labour rights as defined by:

- a. International Bill of Human Rights,
- b. ILO Declaration on Fundamental Principles and Rights at Work.

5.2.4. To ensure respect for the rights referred to in 5.2.2. we commit to follow international standards, including:

- a. UN Guiding Principles on Business and Human Rights,
- b. OECD Guidelines for Multinational Enterprises on Responsible Business Conduct,
- c. Ten Principles of the UN Global Compact.

5.2.5. We recognise that human rights impacts can be both direct and indirect and that violations can potentially occur at any tier of the supply chain. Accordingly, as stated in 5.1.2. we expect all our business partners to ensure respect in their operations and supply chains for all human rights and labour rights referred to in 5.2.3.

5.2.6. We are committed to supporting our business partners in meeting these standards and strive to ensure that all human and labour rights referred to in 4.5 are respected by our business partners. If any negative impacts on human rights are identified, we are committed to assisting them in implementing corrective actions. However, in exceptional cases, including those where a serious negative impact is

identified and where business partner fails to act or unwilling to take corrective action, we reserve the right to terminate the contract.

5.2.7. We are committed to establishing an ethics and human rights management system, based on human rights due diligence process. This system enables the effective identification, assessment, and management of human and labour rights throughout the supply chain.

5.2.8. Whenever human rights violations are identified, we are committed to providing appropriate remedies. This includes implementing preventive measures to avoid future breaches and conducting remediation processes for affected stakeholders.

5.2.9. We are also committed to establishing an effective grievance mechanism (concerns and complaints system) that is accessible to stakeholders affected by the negative impacts of Raben Group's business and operations, including activities within the supply chain. This system is available to those who are aware of actual or potential violations of human rights or this policy.

5.2.10. We comply with the law and local regulations. However, where local laws and human or labour rights differ, we are committed to upholding international human and labour rights to the greatest extent possible. In addition, we encourage all our business partners to adopt the same approach.

5.3. Grievance mechanism

5.3.1. We are committed to maintaining an effective grievance mechanism (concerns and complaints procedures) that ensures all concerns are addressed promptly and fairly, in alignment with our commitment to uphold human rights across our supply chain.

5.3.2. Any violations or potential violations within the scope of the Raben Group Human Rights Policy can be reported anonymously through multilingual platform '[EthicsPoint](#)'. The entire process is conducted in accordance with the Raben Group Whistleblowing Standard.

5.3.3. In addition, any concerns may be reported at the sole discretion by e-mail, telephone, post, in person, or to the Raben Management Services Audit Department, with the annotation "Whistleblowing", at the following address:

**Raben Management Services sp. z o.o.
Audit Department
ul. Zbożowa 1
62-023 Robakowo, Poland**

5.3.4. All reporters, including whistleblowers, as well as affected stakeholders are protected from any form of retaliation or reprisals.

5.4. Governance

5.4.1. A review of the Raben Group Human Rights Policy and the list of salient (significant) human rights issues is conducted annually or whenever:

- a. there are significant changes to the business model,
- b. there are significant changes in the structure of the supply chain,
- c. an incident of human rights abuse occurs,
- d. there are changes in human rights or sustainability due diligence or other related regulations.

5.4.2. Raben Group N.V. adheres to all applicable human rights due diligence regulations.

ARCHIVING

Person responsible	Retention period
Risk Director	5 years

APPENDIXES AND CONNECTED DOCUMENT

Appendixes list	Document connected

HISTORY OF CHANGES

Date	Version	Scope of changes	Author
25.06.2026	1.1	Editorial and stylistic adjustments have been made to improve readability and clarity. Change of layout. The section "Roles and responsibilities" has been added.	Piotr Sokołowski Grzegorz Marciniak Marcelina Sul
Source of current version of document			
All printed or downloaded version of the document are not controlled and might be out of date.			
The current valid documentation is available on the Sharepoint:			
<ul style="list-style-type: none"> • Group standards under: Governance -> Group Standards -> Human Rights 			