

# LEM GROUP Labour & Human Rights Policy

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Throughout this document, the following verbal forms are used:

- “**shall**” or “**must**” indicate a requirement.
- “**should**” indicates a recommendation.
- “**may**” indicates permission.
- “**can**” indicates a possibility or a capability.

Information marked as “NOTE” is for guidance in understanding or clarifying the associated topic.

### 1. PURPOSE

At LEM, we are led by a strong purpose: to help customers and society accelerate the transition to a sustainable future. Sustainability, at LEM, encompasses Environmental, Social and Governance topics. We strongly believe that the respect of labour and human rights contributes to reinforce our social posture as we care about the impact of our decisions on human rights and preventing harm to any person.

LEM is committed to supporting the principles contained within the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO (International Labour Organization) Core Conventions on Labour Standards.



## LEM GROUP Labour & Human Rights Policy

### 2. SCOPE AND EXPECTATIONS

This Labour & Human Rights Policy ("Policy") applies to all LEM Group incl. its different subsidiaries, affiliates, establishments worldwide and should be implemented in daily work. In addition, we expect and support our upstream and downstream supply chain partners, suppliers, and third-party contractors (consultants, temporary workers, volunteers working on any LEM sites) to comply with the principles set forth in this Policy.

LEM expects that any employee, business partners and other parties whose impacts may be directly linked to LEM's operations to report any violation to this Policy, to their manager, Human Resources, Legal Counsel or Speakup line. Whistle-blower process and protection of the whistleblowers are detailed in the LEM Group Whistleblowing and Investigation Policy.

### 3. VERSION LOG

Version	Date (yyyy-mm-dd)	Description of changes
0	2023-11-30	First release
1	2025-02-28	Second release – amend paragraph 5.4, add paragraphs 5.7, 7.5, 8 and 9

### 4. REFERENCE DOCUMENTS

Internal or external	UCLEM	Document title
Internal	CO.01.00.181.0	LEM Group Environmental Policy
Internal	CO.01.00.182.0	LEM Group Safety Policy
Internal	CO.11.10.101.0	LEM Group Code of Conduct
Internal	CO.11.10.606.0	LEM Group Whistleblowing & Investigation Policy



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### 5. OUR COMMITMENT

LEM adheres to Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO (International Labour Organization) Core Conventions on Labour Standards. We also comply with the national laws and regulations in each market we operate in as stated in our Code of Conduct.

We have identified the following areas of focus related to human rights:

#### 5.1 Child/ forced labour

We commit to respect human being and subsequently children's rights. We do not tolerate child labour and work actively against all forms of exploitation of children in any areas of our global operations, facilities, and supply chain. We do not provide employment to children before they have reached the legal age, as defined by the relevant authorities, and do not compromise on the basic requirements defined in the UN Convention of the Rights of the Child.

All forms of forced and compulsory labour are against our principles. We do not practice or tolerate any form of exploitation or forced or compulsory labour, indentured labour, bonded labour, slave labour or any form of human trafficking, and we expect our suppliers to follow the same principles.

#### 5.2 Social dialogue

We recognize and respect the right of our employees to freedom of association and their rights to collective bargaining (incl. labour unions). The employment of a worker is not contingent upon the condition that such worker joins or not a union or be forced to relinquish trade union membership. Furthermore, union membership shall not be the cause for the dismissal of, or otherwise prejudice against, a worker.

#### 5.3 Equal opportunities and non-discrimination

We are committed to an inclusive work culture. We appreciate and recognize that all people are unique and valuable and should be respected for their individual abilities. We do not tolerate any form of harassment or discrimination based on gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age, or political opinion.

We provide equal employment opportunity and treat all employees fairly. LEM people leaders shall only use merit, qualifications, and other professional criteria as the basis for employee-related decisions regarding, for instance recruitment, training, compensation, and promotion.

#### 5.4 Living wages/ compensation

We are aiming to pay every worker a living wage and are currently working in that direction. Living wage is the wage level that is necessary to afford a decent standard of living for workers and their families, considering the country circumstances and calculated for the work performed during the normal hours of work" (as per ILO conventions).

We provide equal pay for equal work and do not tolerate any discrimination related to origin, nationality, religion, race, gender, disability, or age. We comply with the individual national legal standards and the standards of the national branches or company collective labour agreements.



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### 5.5 Working conditions incl. hours

We treat all employees fairly and honestly regardless of where they work. We recognize the right to rest and leisure and therefore comply with local laws, regulations and/or local customs regarding working hours and overtime.

All employees are entitled to good working conditions, rest breaks, rest facilities, privacy and drinking water at their place of work. Moreover, they also receive paid holiday leave in accordance with the legislation of the country where they work in.

### 5.6 Health & Safety

We do not compromise on a safe and healthy working environment for all employees, and we commit to offering safe and healthy workplaces in accordance with national legislation. We have H&S prevention programs and aim at clear objective of zero accidents across all our sites. We seek continuous improvement of occupational health and safety performance for all our employees. Our involvement is described in the LEM Group Health and Safety Policy.

### 5.7 Employment practices

Our organisation is dedicated to upholding and promoting human rights in all employment practices:

We ensure that no original personal documentation, such as passports or identification cards, is retained by the company, allowing employees full ownership and access to their documents. Employment opportunities within our organization are free, and we strictly prohibit any form of payment or fee to secure employment.

Hiring decisions are based solely on the merit and qualifications of the candidate, fostering a fair and inclusive recruitment process. We or any of the workforce providers engaged by us do not accept any payment or benefit either in cash or kind for the employment opportunities from candidates. The company will reimburse any agreed cost engaged by the candidate to participate to the hiring process within a reasonable period. The workforce providers engaged by the company will be solely compensated by the company.

We are dedicated to ensuring living wage for workers and their families (as per ILO conventions), with clear, transparent breakdowns of each pay period, in alignment with all legal and regulatory standards. Job descriptions, responsibilities, and remuneration details are fully disclosed to all employees upon hiring, ensuring clarity and mutual understanding. We uphold a transparent mutual notice period policy, allowing both the employee and employer to terminate the employment relationship with due notice, as outlined in employment contracts and in line with the local legislation.

By embedding these practices, we aim to foster a workplace founded on respect, fairness, integrity and supportive work environment, where employees are valued and supported.



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### 6. HUMAN RIGHTS DUE DILIGENCE

At LEM Group, we are committed to upholding the highest standards of human rights across our operations and value chains. The Executive Committee of LEM is responsible for ensuring adherence to these commitments and our management has responsibility for communicating this Policy, overseeing their implementation, and holding all employees accountable for compliance. Considering the impacts human rights violation can cause, LEM, throughout its different experts (and potential external parties) is engaged in appropriate actions to identify, prevent, or mitigate those impacts in its value chains.

#### 6.1 Internal Audits

We conduct onsite internal audits looking at human rights/ working conditions and compliance with local labour laws to identify, prevent, and mitigate adverse human rights impacts. We might request the support of external expertise and stakeholder consultations in line with the UN Guiding Principles on Business and Human Rights.

#### 6.2 Transparency and Reporting

We maintain a transparent approach by regularly tracking and reporting on our human rights efforts, and ensuring our stakeholders are informed of our progress.

### 7. MEETING OUR HUMAN RIGHTS COMMITMENTS

To meet our human rights commitments, LEM Group takes the following actions:

#### 7.1 Responsibility and Oversight

Designated roles within our management for ensuring continuous oversight and adherence to this Policy.

#### 7.2 Risk Management

We prioritize the most salient risks, continuously improving our due diligence practices through assessments and remediation strategies.

#### 7.3 Supplier Engagement

Collaborating with suppliers, we work to instil respect for human rights in every aspect of the supply chain.

#### 7.4 Continuous Improvement

Aligned with our values of innovation and integrity, we are dedicated to constant enhancement of our human rights approach, seeking new ways to protect and promote human rights globally.



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### 7.5 Reporting and whistleblowing mechanisms

LEM encourages openness and will support Employees and other individuals who raise genuine whistleblowing concerns in good faith under the LEM Group Whistleblowing & Investigation Policy. Any suspected wrongdoings with regards to this Labour & Human Rights policy must be reported through the dedicated [Whistleblowing Centre](#) where the defined process for investigation will be followed.

### 8. REMEDIATION ACTION

At LEM, we are committed to taking immediate and effective remediation actions upon identifying any instance of child labour, modern slavery, forced labour, or human trafficking in our operations or supply chain. Upon verification of any such violation, we will collaborate with local authorities to address the situation, ensuring that affected individuals receive appropriate support and protection.

#### 8.1 Remediation for child labour:

When child labour is identified within our operations or supply chain, we commit to taking swift, responsible, and child-centred remediation actions to ensure:

- **Immediate withdrawal:** The child will be immediately removed from the work environment to ensure their safety and well-being. No further work will be assigned, and care will be taken to ensure this removal is managed sensitively.
- **Partner engagement:** We will hold accountable any suppliers, contractors, or partners involved in or failing to prevent these practices, implementing corrective actions, up to and including suspension or termination of business relationships if necessary. This may involve conducting a root-cause analysis with involved suppliers.
- **Supply chain and process improvements:** A thorough review of our supply chain and hiring practices will be conducted to identify and address any contributing factors that allowed child labour to occur.
- **Preventive measures:** To prevent future occurrences, we will strengthen our due diligence and risk assessment procedures, refresh our suppliers on child labour laws, standards, and channels for anonymous reporting.

#### 8.2 Remediation for modern slavery/forced labour/human trafficking:

When modern slavery, forced labour, or human trafficking is identified in our operations or supply chain, we are committed to implementing effective and humane remediation actions to protect affected individuals and address root causes. These actions include:





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- **Immediate withdrawal:** We will ensure the immediate removal of affected individuals from abusive working conditions to ensure their safety and well-being.
- **Partner engagement:** We will hold accountable any suppliers, contractors, or partners involved in or failing to prevent these practices, implementing corrective actions, up to and including suspension or termination of business relationships if necessary. This may involve conducting a root-cause analysis with involved suppliers.
- **Policy and process strengthening:** A full review of our policies and due diligence processes will be conducted to identify and close any gap. Enhanced screening, monitoring, and auditing protocols will be implemented, with an emphasis on high-risk regions and industries.

### 9. AWARENESS & TRAINING AMBITIONS

At LEM, we are deeply committed to fostering an environment where the principles of labour and human rights detailed above are upheld and respected. As part of this commitment, we have established a comprehensive training program aimed at educating and empowering our employees on these critical issues. This program not only reinforces our dedication to ethical practices but also equips our workforce with the knowledge and tools necessary to contribute to a fair and just workplace. We believe that informed employees are the cornerstone of a responsible and sustainable organization.

