

Exclusive Networks Group's Human Rights Policy

 **PURPOSE**

This Policy formalizes Exclusive Networks' commitment to respect and promote human rights in its operations and value chain.

 **SCOPE**

The Human Rights Group Policy applies to Exclusive Networks S.A. and all its affiliates, in all its activities and to all its employees. In this document, "Exclusive Networks" represents this entire scope.

 **COMPLIANCE WITH INTERNATIONAL STANDARDS**

Exclusive Networks endorses the internationally recognized human rights set forth in the following conventions and standards:

- The United Nations Universal Declaration of Human Rights,
- The United Nations Guiding Principles on Business and Human Rights,
- The principles and rights of the International Labour Organization Declaration, which promotes decent work throughout the world, and the fundamental conventions, namely:
 - Convention No. 29 concerning Forced Labour,
 - Convention No. 87 on freedom of association and protection of the right to organize,
 - Convention No. 98 on the right to organize and collective bargaining,
 - The Equal Remuneration Convention No. 100,
 - Convention No. 105 on the Abolition of Forced Labour,
 - Convention No. 111 of 25 concerning Discrimination in Respect of Employment and Occupation,

- The Minimum Age Convention No. 138,
- The Worst Forms of Child Labour Convention No. 182.
- The Guidelines of the Organisation for Cooperation and Economic Development for Multinational Companies,
- The United Nations International Convention on the Elimination of All Forms of Racial Discrimination,
- The United Nations International Covenant on Economic, Social, and Cultural Rights,
- The United Nations International Covenant on Civil and Political Rights,
- The United Nations Convention on the Rights of the Child,
- The United Nations Convention on the Rights of Persons with Disabilities.

STATEMENT

Exclusive Networks is a company committed to respecting the dignity of all persons and the rights which are inherent to them as human beings.

Our first obligation is to protect and promote human rights across our employees, business partners' interactions, and the local communities where we operate. We respect all local applicable laws, and along with our [Code of Conduct](#), establish specific policies across our organization when relevant.

OUR COMMITMENTS

Our steadfast commitment to key human rights issues:

- Freedom of expression:
 - We respect and protect the right to express all speech and expression without censorship or regulation.
- Freedom of association, right to organize and collective bargaining:
 - We respect and guarantee the freedom of association, the right of individuals to form or join a labor union of their choice, engage in union activities, bargain collectively and participate in peaceful assemblies.
- Diversity, inclusion and equal opportunities, prohibition of discrimination:
 - Diversity, equity and inclusion¹ is the daily reality of how we live and work within the Group and of how we interact together with our business partners. We embed diversity, equity & inclusion in our organization and promote equal access to opportunity for all our employees.
 - We prohibit and reject discriminatory treatment without prejudices associated to age, gender identity and gender expression, people with different physical and mental abilities, nationality, social and ethnic origin, social status, religion and belief, political opinion, health status, sexual identity, and sexual orientation.
- Prohibition of child labor, forced labor, slavery and human trafficking:
 - We prohibit and reject all forms of child labor, human trafficking, forced and compulsory labor in our operations and value chain.

¹ See our [Diversity, Equity and Inclusion Policy](#)

- Privacy and personal information protection:
 - We ensure the proper processing of personal data with the goal of respecting the fundamental rights and freedoms of individuals, and specifically, the fundamental right to the protection of personal data.

ONBOARDING OUR VALUE CHAIN

As a company with operations in 47 countries and a value chain of thousands of vendors, resellers and end users, we are aware of our responsibility to promote respect for human rights throughout our value chain. However, we cannot achieve this goal alone.

Therefore, we are committed to working together with our business partners and stakeholders to uphold the principles set forth in this Policy. We require them to adopt similar policies and practices in their activities, that are at least equivalent to those covered by this Policy.

REPORTING OF NON-COMPLIANCE AND REMEDIATION

To address any violations or risks of violation of human rights, Exclusive Networks encourages employees, business partners or external stakeholders to report about it through the channel of their choice, or by using the whistleblowing on a confidential basis. We are committed to protecting the identity of the whistleblowers using this line in good faith, and to safeguarding against any form of retaliation or unfair treatment.

In case of non-compliance, we will launch prompt and accurate investigation of the cause and take timely, fair, and appropriate corrective measures to remediate, including sanctions or disciplinary action, up to and including termination in case of serious breach.

GOVERNANCE

Ultimate responsibility for the commitment to Exclusive Networks' Human Rights Policy lies with the Group CEO together with the Executive Committee, under the monitoring of the Board of Directors. Responsibility for implementation lies with operational and functional leaders across the Group, supported by a global program driven by the Group General Counsel & Group Compliance Officer.

We work together to ensure respect and fulfillment of human rights as per international standards and as mentioned herein.

**Approved by the Board of Directors of Exclusive Networks S.A.,
at its meeting of June 7, 2023**