

Human Rights, Modern Slavery and Child Labour Policy

1. Purpose

Siderise is committed to conducting business ethically, responsibly and with respect for human rights. This policy sets out our approach to preventing and addressing human rights risks, including modern slavery, forced labour, human trafficking, child labour, illegal working, discrimination, unsafe working conditions and other labour rights issues.

This policy supports our commitment to acting with integrity and maintaining appropriate, risk-based systems and controls across our operations, supply chains and business relationships.

2. Scope

This policy applies to all employees, workers, agency workers, contractors, consultants, temporary workers, apprentices, interns and any other individuals working for or on behalf of Siderise.

This policy also sets out Siderise's expectations of suppliers, contractors, subcontractors, labour providers, recruitment agencies, service providers, consultants and other business partners.

Where local legal requirements differ from this policy, Siderise will comply with applicable law. Where this policy sets a higher standard, we will seek to apply the higher standard where legally permissible.

3. Human rights commitment

Siderise respects internationally recognised human rights and is committed to avoiding involvement in human rights abuses.

We are committed to:

- treating people with dignity, fairness and respect;
- taking steps to prevent modern slavery, forced labour, human trafficking and child labour;
- supporting ethical recruitment and prevention of illegal working;
- providing safe and healthy working conditions;
- preventing discrimination, harassment, bullying and abuse;
- respecting worker voice and freedom of association;
- supporting protections for vulnerable workers, including migrant, agency, temporary and young workers;
- providing accessible reporting channels and protection from retaliation;
- addressing concerns and taking corrective action where required.

Siderise expects all employees and workers to comply with this policy, and expects suppliers and business partners to uphold the relevant standards set out in this policy.

4. Standards we align with

Siderise's approach is informed by:

- the United Nations Guiding Principles on Business and Human Rights;
- the International Bill of Human Rights;
- the International Labour Organization Declaration on Fundamental Principles and Rights at Work and relevant ILO fundamental conventions;
- the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;
- the United Nations Convention on the Rights of the Child;
- the UK Modern Slavery Act 2015;
- the Immigration, Asylum and Nationality Act 2006;
- applicable employment, labour, equality, immigration, health and safety, data protection and human rights laws in the countries where we operate.

5. Modern slavery, forced labour and human trafficking

Siderise has zero tolerance for modern slavery, forced labour, servitude, bonded labour, compulsory labour, human trafficking and exploitation.

We prohibit:

- slavery, servitude and forced or compulsory labour;
- human trafficking;
- bonded labour or debt bondage;
- withholding wages as a means of coercion;
- retention of passports, identity documents or personal documents;
- worker-paid recruitment fees;
- threats, intimidation, violence, coercion or restriction of movement;
- deceptive recruitment or substitution of employment terms.

All work must be undertaken voluntarily. Workers must be free to leave employment or engagement in accordance with applicable law and contractual requirements.

6. Child labour and young workers

Siderise does not tolerate child labour in its operations or supply chains.

Siderise will not employ, engage or permit work by anyone below the legal minimum working age. Hazardous work is prohibited for anyone under the age of 18.

Where young workers, apprentices, interns or work-experience students are engaged, appropriate safeguards must be in place, including supervision, risk assessments, working time controls, training and compliance with applicable legal requirements.

If actual or suspected child labour is identified in Siderise's operations or supply chain, the matter must be escalated to HR and appropriate senior management. Siderise will seek to respond in a

proportionate way that prioritises the welfare, safety and best interests of the child and avoids actions that could cause further harm.

Where appropriate, Siderise will seek to verify the child's age, assess the circumstances, and agree a remediation approach in line with applicable law and relevant guidance. Remediation may include removing the child from hazardous or inappropriate work, engaging with the supplier, parent or guardian, relevant authorities or specialist organisations, and agreeing corrective actions to prevent recurrence.

Suppliers and business partners are expected to cooperate with any investigation, remediation or corrective action relating to actual or suspected child labour.

7. Ethical recruitment and migrant workers

Siderise is committed to fair, lawful and ethical recruitment.

Recruitment decisions must be based on role requirements, skills, experience, qualifications and the legal right to work. Recruitment must be free from discrimination.

Siderise will ensure that prospective employees are legally entitled to work before employment starts. Right-to-work checks will be conducted fairly, consistently and without discrimination.

Siderise will comply with applicable immigration and right-to-work legislation, including the Immigration, Asylum and Nationality Act 2006, Home Office guidance, and relevant codes of practice on preventing illegal working and avoiding unlawful discrimination. Operational controls for right-to-work checks, time-limited permissions, agency workers, contractors and subcontracted personnel are set out in the HR Right to Work and Prevention of Illegal Working Procedure.

Siderise recognises that migrant workers, agency workers, temporary workers and workers supplied through labour providers may be at increased risk of exploitation due to factors such as immigration status, language barriers, dependency on labour providers or limited knowledge of local rights. Siderise will seek to ensure that recruitment and engagement practices are fair, transparent and non-discriminatory, and that any concerns relating to exploitation or illegal working are escalated and addressed in accordance with relevant HR procedures.

8. Wages, benefits and working hours

Siderise will comply with applicable laws and contractual requirements relating to wages, benefits, working hours, rest breaks, holiday entitlement and overtime.

Workers must be paid on time and receive at least the legal minimum wages and benefits applicable to their role and location.

Deductions from wages must be lawful, transparent and properly authorised. Working hours and overtime must be managed responsibly and must not create health, safety or wellbeing risks.

Siderise expects equivalent standards from suppliers, contractors and labour providers.

9. Freedom of association and worker voice

Siderise will comply with applicable laws relating to freedom of association, worker representation and collective bargaining.

Siderise will not prevent workers from lawfully joining, forming or choosing not to join a trade union or worker representative body.

Siderise will not tolerate discrimination, intimidation or retaliation against workers for lawfully exercising their rights.

Siderise will provide appropriate channels for workers to raise concerns, provide feedback or engage with management.

10. Equality, non-discrimination, harassment and dignity at work

Siderise is committed to providing a working environment where everyone is treated with dignity, fairness and respect.

We do not tolerate discrimination, bullying, harassment, sexual harassment, victimisation, intimidation, verbal abuse, physical abuse or degrading treatment.

This applies to recruitment, promotion, training, pay, benefits, working conditions, performance management, disciplinary processes, redundancy and termination.

This policy should be read alongside Siderise's EDI Policy, Bullying, Harassment and Sexual Misconduct Policy and other relevant HR policies.

11. Health, safety and wellbeing

Siderise recognises safe and healthy working conditions as a fundamental human rights issue.

We are committed to providing safe, healthy and legally compliant working environments for employees, workers, contractors, visitors and others affected by our activities.

Health and safety risks will be managed through appropriate systems, risk assessments, training, supervision, safe working procedures, incident reporting and continuous improvement.

This policy should be read alongside Siderise's Health and Safety Policy and related procedures.

12. Privacy and data protection

Siderise respects the privacy and personal data rights of employees, workers, applicants, contractors, suppliers, customers and other stakeholders.

Personal data must be collected, used, stored, shared and retained lawfully, fairly, securely and transparently, in line with applicable data protection legislation and Siderise's GDPR and data protection requirements.

This policy should be read alongside Siderise's GDPR Policy and related data protection procedures.

13. Supplier and contractor requirements

Siderise expects suppliers, contractors, subcontractors, consultants, labour providers, recruitment agencies and other business partners to act ethically and respect human rights.

They are expected to:

- comply with applicable labour, employment, immigration, health and safety, equality and human rights laws;
- prohibit modern slavery, forced labour, human trafficking and child labour;
- ensure workers have the legal right to work;
- provide safe and healthy working conditions;

- treat workers with dignity and respect;
- pay wages and benefits lawfully;
- manage working hours responsibly;
- prevent discrimination, harassment, bullying and abuse;
- respect worker voice and lawful freedom of association;
- cooperate with Siderise due diligence, audits, assessments and corrective actions where required.

For agency workers, contractors and subcontracted personnel, Siderise expects the relevant agency, contractor, subcontractor or labour provider to confirm that appropriate right-to-work checks have been completed before workers are supplied to Siderise or permitted to work on Siderise-controlled activities.

Substitute or replacement workers must not be sent to Siderise sites or activities unless applicable legal, right-to-work, health and safety, induction and competence requirements have been met.

Supplier and contractor requirements are further set out in Siderise's Supplier Code of Conduct, Responsible Sourcing Policy, procurement procedures and contractual terms.

14. Human rights due diligence

Siderise is committed to taking a risk-based approach to identifying, assessing, preventing, mitigating and addressing actual and potential human rights risks connected to our operations, supply chains and business relationships.

Our due diligence approach may include:

- assessing risks by country, sector, supplier type, activity, workforce type and business relationship;
- considering risks linked to raw materials, manufacturing, construction, maintenance, logistics, labour providers and recruitment agencies;
- conducting supplier screening, questionnaires, audits or assessments where appropriate;
- reviewing recruitment, right-to-work and labour provider controls;
- seeking input from potentially affected rightsholders and stakeholders, where appropriate, when assessing human rights risks and developing mitigation measures;
- integrating human rights considerations into HR, procurement, ESG, legal, health and safety and operational decisions;
- identifying corrective actions and monitoring progress;
- escalating serious concerns to appropriate senior management.

Siderise will give particular attention to higher-risk groups, including migrant, agency, temporary, young and subcontracted workers.

15. Grievance, whistleblowing, corrective action and remedy

Siderise encourages employees, workers, contractors, suppliers and other relevant parties to raise concerns about actual or suspected breaches of this policy.

Concerns should be raised through the appropriate available reporting route, including line management, HR, grievance procedures or whistleblowing channels.

Siderise will not tolerate retaliation against anyone who raises a concern in good faith.

Where concerns are substantiated, Siderise will take proportionate corrective action.

Corrective action or remedy may include changes to working practices, correction of records where required, additional training, supplier corrective action, suspension of work, termination of contract, or referral to relevant authorities where legally required or appropriate.

For supplier-related concerns, Siderise will seek to use its influence to require investigation, corrective action and prevention of recurrence.

Child labour concerns will be managed in line with the child labour remediation process set out in Section 6.

This policy should be read alongside Siderise's Whistleblowing Policy, Grievance Policy and related HR procedures.

16. Training and awareness

Siderise will provide appropriate training and awareness to support the implementation of this policy.

Training may cover:

- modern slavery, forced labour, human trafficking and child labour risks;
- ethical recruitment and right-to-work responsibilities;
- supplier and contractor human rights expectations;
- signs of labour exploitation;
- grievance and whistleblowing routes;
- non-discrimination and dignity at work;
- health, safety and wellbeing responsibilities;
- procurement and supplier due diligence requirements.

Training will be proportionate to role and risk. HR, procurement/supply chain, operations, ESG and other relevant functions may receive more detailed training.

17. Governance and responsibilities

The Management Board and senior leadership team are responsible for oversight of this policy and for supporting appropriate resources and accountability.

HR is responsible for employment-related implementation, including recruitment, right-to-work controls, worker relations, training, grievances and relevant HR procedures.

Procurement/Supply Chain is responsible for embedding supplier and contractor expectations into procurement processes, supplier onboarding, contracts, due diligence and supplier performance management.

ESG supports human rights risk assessment, sustainability reporting and alignment with responsible business standards.

Compliance supports interpretation of legal requirements, contractual controls and escalation of significant compliance concerns.

Health and Safety is responsible for managing occupational health, safety and wellbeing risks.

Site leadership and operational managers are responsible for implementing this policy locally, escalating concerns and ensuring contractors and visitors comply with relevant requirements.

Employees, workers and contractors are responsible for complying with this policy.

Suppliers and business partners are expected to meet the relevant requirements set out in this policy, cooperate with due diligence where required and report concerns where appropriate.

18. Monitoring, reporting and review

Siderise will monitor the implementation and effectiveness of this policy through appropriate governance, reporting and review processes.

Monitoring may include:

- training completion;
- supplier due diligence completion;
- supplier acceptance of the Supplier Code of Conduct;
- right-to-work compliance monitoring;
- labour provider, agency worker and contractor checks;
- grievance and whistleblowing reports;
- human rights concerns and actions taken;
- modern slavery and child labour risk assessments;
- supplier corrective action plans;
- audit findings and nonconformities.

This policy will be reviewed at least annually, or earlier where required due to changes in legislation, business activities, operating countries, supply chain risk, audit findings, customer requirements, serious incidents or organisational change.

As Siderise is required to publish an annual Modern Slavery Statement, this policy supports the annual disclosure of the steps taken to prevent modern slavery and human trafficking in our operations and supply chains.

Breaches of this policy may result in disciplinary action, supplier corrective action, suspension of work, termination of contract, notification to relevant authorities where appropriate or legally required, or other appropriate action.