



# Human Rights Policy

## Vers. 1

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Approved by:	<i>Jorge Barcelo Pamies</i>
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## **Purpose**

INMATRADE AG values people highly and strives to create a working environment in which our employees, business partners, local communities and other stakeholders can fully realize their potential. We handling our business in a way that respects the human rights and dignity of our workforces, those who involved in our supply chains, and the societies in which we operate. Respect for human rights is a major part of our efforts to run a sustainable business.

## **Scope**

The fundamental idea of this Policy is that all people are born free and equal in dignity and rights, regardless of their race, skin color, gender, language, religion, political or other beliefs, national or social origin, property status, birth or other characteristics.

INMATRADE AG's Human Rights Policy (hereinafter referred to as the "Policy") will apply to the relationship between INMATRADE AG and all significant stakeholders, including directors, officers and employees of the company, as well as business partners and local communities. All employees of INMATRADE AG are obliged to comply with this Policy. In cases where the laws and regulations of the countries in which we are represented differ from our Policies, we will apply any higher standards regarding human rights.

## **Obligations of the Company**

- Provide trainings on human rights, including ethics and business conduct to Company's employees annually.
- Provide a functioning confidential hotline through which everyone can report their concerns about possible violations to INMATRADE AG or our suppliers in order to prevent and minimize the risk of human rights violations.
- Develop and maintain a business free from discrimination, where each employee has the opportunity to contribute to the overall results and realize their abilities and potential.
- INMATRADE AG must regularly monitor and analyze the effectiveness and efficiency of this Policy, conduct a comprehensive review of the Policy and report to the Board of Directors. All senior officials of the company will demonstrate in

practice their personal commitment to human rights, ethical behavior and compliance with this Policy.

INMATRADE AG guarantees that every employee can count on:

- An open and constructive discussion of the results of their work with the manager;
- Support in the development of their competencies and skills;
- Recognition and financial remuneration based on the results of the Company's activities and their personal results;
- Respectful treatment and provision of equal opportunities;
- Availability of the safest working conditions at all enterprises.

### **Obligations of Employees**

- Know and comply with all applicable human rights laws and regulations;
- In case of detection of any violation of the rules and requirements of this Policy, immediately inform the management about it.

### **Prohibition of child labor**

INMATRADE AG does not allow any form of child labor, forced labor, human trafficking and other forms of slavery (known as "modern slavery"), which are strictly prohibited by INMATRADE AG and their suppliers. We strive to act ethically and require our suppliers to carry out their activities within the same ethical framework. We conduct a risk assessment to determine which parts of our business and which of our suppliers and subcontractors are at risk of human rights violations. We interact with suppliers on human rights issues to better understand their actions to prevent human rights violations at their enterprises. We also conduct a comprehensive audit throughout the life cycle of our operations, and, if necessary, develop corrective actions.

INMATRADE AG will not hire children under the minimum age for employment in accordance with the current national legislation, in any case not younger than 15 years. In addition, INMATRADE AG guarantees that persons under the age of 18 will not perform any duties abroad or perform dangerous work that may endanger their health or safety, including night shifts and overtime. "Child labor" means any work of a child or teenager, if it is not considered permissible in accordance with the 1973 ILO Convention on

Minimum Age (Article 138). INMATRADE AG supports the use of legitimate internship/internship programs in the workplace that comply with all laws and regulations, provided that these laws and regulations comply with Swiss legislation and international standards.

### **Prohibition of forced labor**

INMATRADE AG does not accept any form of forced labor in its commercial activities, including debt bondage, forced labor or forced imprisonment, as well as any participation in human trafficking. This includes transporting, harboring, recruiting, transferring or receiving people by threat, force, coercion, abduction or fraud in order to obtain labor or services. INMATRADE AG will not forcibly restrict the freedom of employees on the territory of the enterprise or unreasonably restrict access to or leaving workplaces. INMATRADE AG will work with its suppliers to eliminate modern slavery, forced labor and human trafficking in its supply chain. Prohibition of activities related to human trafficking - INMATRADE AG complies with the requirements of Swiss and international legislation on the prohibition of slavery and human trafficking.

### **Working conditions**

Working conditions, working hours, breaks, holidays and vacation periods should be established in accordance with local regulations, laws and agreements, and in any case, the working week should not exceed 40 hours per week, including overtime, except for emergency or emergency situations. Employees are granted at least two days off every seven days. INMATRADE AG guarantees that all employees have written employment agreements and are free to leave their jobs after submitting an application within the time limits established by law. In addition, compensation paid to employees must comply with all applicable wage laws, including laws relating to minimum wages, overtime hours and statutory benefits. Deductions from wages as a disciplinary penalty are not allowed. For each pay period, employees should be provided with an understandable payroll statement in a timely manner, which includes sufficient information to verify payments for work performed. The use of temporary labor and the involvement of third-party organizations will be carried out within the framework of Swiss legislation.

## Reporting and Investigating

The Company operates a confidential hotline through which everyone can report their concerns about possible violations to INMATRADE AG or our suppliers in order to prevent and minimize the risk of human rights violations. We will protect employees who express their concerns in good faith, even if they are wrong. We strive to ensure that no employee is subjected to any adverse treatment as a result of conscientiously reporting their concerns or suspicions of discrimination or harassment taking place in our company or in any of our supply chains. For that we have established the following obligatory procedure for whistleblowers:

- Consider the complaint for credibility, as well as the associated risks for the whistleblower, employees and for the company.
- Determine the circle of persons who can be informed about this complaint.
- Investigate the incident.
- Work out a solution in the course of which the whistleblower should not suffer if his/her/their actions are legal.

Any claims or accusations that are found to be knowingly false are grounds for disciplinary action against the employee.

**The Human Rights Manager** is responsible for developing and implementing stakeholder engagement strategy, including partnerships with multilateral institutions and others, responsible for working with key internal and external stakeholders to investigate and remediate human rights or labor-related issues within INMATRADE AG supply chain.

## Laws and Regulations

- Legislation of Switzerland
- Universal Declaration of Human Rights (UDHR)
- The International Covenant on Civil & Political Rights (ICCPR)
- International Covenant on Economic, Social and Cultural Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- Principles of the UN Global Compact

- The Guiding Principles of Entrepreneurship in the Aspect of Human Rights, approved by the UN

**Contact Information**

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