

Human Rights Policy

This policy supersedes all related documentation within the company



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I. SUBJECT:

This policy is established to:

- provide guidance to Employees and Stakeholders on how to perform business respecting all Human Rights and social values;
- guide them through recognizing and dealing with breaching Human Rights and social values;
- understand their responsibilities.

From time to time, and in order to ensure regularity and effectiveness of this policy, changes to this policy will be submitted to the Company's Top Management for review and approval. All changes will be promptly communicated to Coficab's Employees.

II. INTENTIONS AND ORIENTATIONS:

In a commitment to upholding sustainability and business integrity, COFICAB is continuously committed to abide by the highest standards of business ethics when conducting its business operations and to respect Human Rights.

III. GUIDELINES:

This policy is based on the following guidelines:

- UN Guiding Principles on Business and Human Rights;
- UN Global Compact;
- The International Bill of Human Rights;
- The ILO Declaration on Fundamental Principles and Rights at Work;
- The Universal Declaration of Human Rights

IV. POLICY STATEMENT:

A- Coficab's commitments:

- **Human Rights**
- **Labor Rights**

1- Human Rights:

Coficab is committed to:

- provide and promote a healthy, violence-free and harassment/bullying-free work environment. Any kind of harassment, including physical, sexual, and psychological abuse, as well as emerging forms of violence such as digital harassment for all genders is prohibited by Coficab.
- promote a culture of inclusion and equal opportunity for all and recognize all the rights and freedoms set forth by the laws and regulations, without distinction of

any kind, such as race, color, gender, language, religion, political or other opinion, national or social origin, property, place of birth or other status.

- comply with applicable laws concerning personal data privacy and Coficab's cybersecurity program, which includes information technology policies, guidelines and procedures and specific measures to protect the integrity, confidentiality, accessibility and availability of personal data.
- not unlawfully evict or deprive people of their homes, lands, and waters.
- refrain from hiring or using violent private or public security forces.
- respect the rights of vulnerable groups including migrant workers, persons with disabilities and indigenous peoples.

2- Labor Rights:

Coficab is committed to:

- recognize the freedom of work, all work must be done by choice, and employees must be able to end the work or the employment relationship at any time.
- provide equal opportunity and fair treatment for all employees.
- uphold zero tolerance of exploitation of children or adolescents in any form.
- Coficab respects the right to just and favorable remuneration and the minimum working age, as stipulated in local and international laws.
- prohibit unjustifiable labor practices including forced labor, slave labor, human trafficking or similar form of labor.
- comply with all applicable wages and working hours regulations. Overtime is only permitted if it is performed on a voluntary basis and does not exceed a total of legally permitted overtime hours per week.
- respect employees' freedom of association as provided by relevant legislation.
- not to require employees to pay any recruitment fees or other related fees to Coficab's agents or sub-agents as a condition to their employment
- provides a workplace that is safe and healthy for all employees and that any risks to employees' health are proactively addressed.

B. Risk Assessment

Coficab will conduct regular Human Rights risk assessments in order to uphold ethical standards and ensure legal compliance. These assessments should identify vulnerabilities and potential threats.

Key objectives of assessment shall include evaluating risks, establishing different scenarios, solutions and remedies, enhancing compliance capabilities, and fostering an ethical culture.

C. Training and Communication

This policy will be communicated to all employees working at all levels and grades.

Coficab requires that all suppliers, contractors, and third-party partners comply with the same ethical standards set forth in this policy. Coficab reserves the right to audit

and assess supplier compliance regularly and will take appropriate actions in case of violations.

Coficab will provide training as a part of the induction process for all new employees.

Coficab will also provide regular, relevant training on how to implement and adhere to this policy to all regular employees.

V. ROLES AND RESPONSIBILITIES:

1. Applicability:

This policy is an integral part of Coficab's Code Of Conduct.

This policy applies to all Employees working at all levels and grades, including officers, directors, senior managers, and all other Employees (whether permanent, fixed term or temporary), trainees, interns, consultants, contractors, or any other person associated with or acting on behalf of Coficab, its board members, Coficab Group owners, customers and all Coficab Group supply chain.

2. Responsibility:

2.1. Stakeholders' responsibility:

Stakeholders must read, understand and comply with this policy.

They are also required to avoid any activity that might lead to, or suggest, a breach of this policy.

Stakeholders must report any suspicions of fraudulent or corrupt activities to:

- compliance@Coficab.com
- COFICAB TUNISIE S.A, CORPORATE LEGAL AND COMPLIANCE DEPARTMENT,
ADDRESS: 40 RUE DU 18 JANVIER, 1958, 1001, TUNIS, TUNISIA

Employees and management may also have recourse to the internal whistleblowing channel including all designated contacts in section 4 of Coficab Code Of Conduct.

2.2. Coficab's responsibility: Investigation:

After receiving the report, Coficab will assess the need to conduct an investigation or not.

In case allegations are confirmed to be serious, Coficab will conduct a thorough investigation by gathering and checking all necessary data, evidence and witnesses' interviews in respect with investigation procedure as described in **Guidebook For Country/ Corporate Code Of Conduct Investigation**.

Coficab will treat all reports confidentially, in consistence with the law, and Company policy.

VI. CONSEQUENCES OF POLICY VIOLATION:

Any violation of this Policy by employees will be regarded as a serious matter and shall result in disciplinary action, including but not limited to termination, consistent with applicable law and the employee's terms of employment.

Breaching Human Rights and Labor Rights may be, in some cases, considered as criminal offenses; hence employees will be accountable for any breach of this policy.

Legal sanctions include imprisonment, probation, and monetary fines (which will not be paid by the Company).

VII. UPDATES FOLLOW UP:

Date	Version	Change details	Issuer/modifier

