

Group Policy - Labour standards and human rights

Approved by Board on 25 January 2024

1. Introduction and purpose

The Pebble Group plc (“**Group**”) is committed to high standards of business and ethical behaviour including compliance with all applicable laws and regulations. We believe that long-term business success can only be achieved if labour standards and human rights are acknowledged and protected.

This Policy sets out the fundamental principles embedded in our business operations and culture to ensure we do not engage in activities that directly or indirectly violate labour standards and human rights. It is our corporate responsibility to uphold these principles throughout our entire organisation.

This Policy is supported by the Group Environmental, Social and Governance Policy and the Group Diversity, Equity and Inclusion Policy.

2. Our Responsibilities – who must comply with this Policy?

The Group Chief Executive Officer (“**CEO**”) has primary responsibility for establishing and maintaining proportionate and effective labour standards and human rights policies and processes within the Group. Ultimately the Pebble Group Board of directors has overall responsibility for ensuring this Policy complies with our legal, regulatory, and ethical obligations, and that all those under our control comply with it.

Then it is the responsibility of the Divisional Lead of each Group business and their leadership teams, to ensure the effective implementation and operation of the details outlined in this Policy by their respective businesses and for managing the Group’s compliance with all labour standards and human rights requirements.

Management at all levels are responsible for upholding labour standards and human rights and ensuring those reporting to them understand and comply with this Policy, as applicable to them in their role.

All directors, officers and employees at all levels, as well as other personnel who have the status of employees of the Group and its subsidiaries (collectively “**Group Employees**”) have to follow the requirements of this Policy (or their business’ equivalent policy and procedures) so far as they are relevant to their role and their duties. This extends to all our business dealings and transactions in all countries in which we operate.

In addition, we seek to work with business partners and others who share our values and standards and we expect them to behave consistently with the provisions in this Policy.

This Policy is directly applicable to each Group business. It is the responsibility of each Divisional Lead to either incorporate it directly as one of their own working documents or ensure that their business has its own equivalent policy and procedures on labour standards and human rights. Such policies and procedures must be adapted to the businesses’ own needs and the requirements of applicable local laws and regulations. However, they must also be consistent with, and a more detailed continuation of, the principles and provisions of this Policy.

3. Questions on this Policy - who to go to for advice and guidance?

If you have questions or concerns regarding any aspect of this Policy or wish to seek guidance on its interpretation and application in a specific situation, you should raise and discuss this with your direct line manager, any member of the senior management team or your local HR department.

4. How to raise concerns and seek guidance

If circumstances arise that give you reason to pause and consider whether a proposed course of action may contravene or contradict the principles contained in this Policy, if you suspect an issue has arisen in relation to this Policy or a breach of this Policy has occurred or may occur (involving other employees or

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any third party), it is your duty to speak up and you are encouraged to immediately notify your manager, member of the senior management team or your HR Department.

Alternatively, you can report it through our Group Whistleblowing Portal:

<https://thepebblegroup.integrityline.com/>.

Employees will receive the Group's full support when raising any such concerns.

5. Policy Statement

The Group is committed to respecting labour standards and human rights in line with principles and guidance outlined in the U.N Guiding Principles for Business and Human Rights and the International Labour Organisations Declaration on Fundamental Principles and Rights at work.

We recognise our responsibility and the importance of labour standards and human rights to our employees and stakeholders, there is both a business and moral case for ensuring that both labour standards and human rights are upheld and respected across our Group and throughout our business relationships. The Group and our businesses have policies and processes in place which aim to identify, prevent and mitigate poor labour standards and human rights risks.

6. Our Labour Standards and Human Rights Commitments

Discrimination and Harassment

- The Group is committed to equal opportunity in all aspects of employment. We strive to provide a positive environment which supports productivity, dignity and self-esteem for each employee.
- As outlined in our Group Diversity Equity and Inclusion (DEI) Policy, we oppose all forms of unfair or unlawful discrimination and will not tolerate discrimination based on ethnicity, nationality, race, religion or belief, their gender / gender reassignment, age, disability, marriage / civil partnership, pregnancy / maternity, education, socio-economic background or sexual orientation. Every effort must be made to ensure that every employee feels respected and is treated fairly.
- We are alive to the fact that harassment can take many forms and we adhere to all applicable requirements to have a process in place to protect workers from any acts of physical, verbal, sexual or psychological harassment, abuse or threats in the workplace, and to deal with discrimination and harassment cases. Employment-related decisions, from hiring to termination and retirement shall be based on relevant and objective criteria. Our Group DEI Policy recognises difference as a positive element, embracing diversity is an important part of our long-term success.
- We commit to taking all allegations of discrimination and harassment very seriously. All case reported will be investigated and appropriate action taken should any employee be found to have acted inappropriately.

Forced labour/modern slavery

- Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced / compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- As outlined in our Group Anti-Slavery and Human Trafficking Policy, the Group aims to engage with our stakeholders to manage the social and ethical impact of our activities in the different markets in which we operate and we take a zero-tolerance approach to any form of forced labour, slavery and human trafficking in our organisation and our supply chains. The Group also supports all employees

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to set a culture whereby decisions are made in line with this stated position and the applicable law and regulation in this area.

- We commit to enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own businesses or in any of our businesses' supply chains.

Child labour

- The Group does not condone the use of child labour under any circumstances. The minimum age for full-time employment in 'regular work' shall be 16 years old or the legal minimum age for employment, whichever is greater. If the local minimum working age is 14-year-old in accordance with exceptions for developing countries, this lower age shall apply. Across our Group we will not hire workers under the age of 18 years old for positions where 'hazardous work' is performed.

Freedom of association and collective bargaining

- The Group shall respect employees' rights to form, not join or join a labour union or other organisation of their choice, and to bargain collectively in support of their mutual interests without fear of discrimination, intimidation, harassment or termination of employment. If no legally recognised union exists, the Group shall respond to initiatives to establish internal means to achieving effective representation of workers interests.

Working hours, benefits and wages

- The Group shall ensure, as a minimum, it adheres to all applicable laws or industry standards, whichever may be more stringent, relating to wages, working hours, overtime and benefits. We are committed to continuously developing employee skills and capabilities, and to providing opportunities for career advancement.
- In the event of termination of employment, we commit to meeting or exceed applicable laws and industry standards.

Leave

- The Group shall grant all employees the right to sick leave and annual holiday, as well as parental leave for employees who have to care for a new-born child or newly adopted child as provided by national legislation. Employees who take such leave shall not face dismissal or threat of dismissal, and subject to business conditions, shall be able to return to their former employment or equivalent employment on comparable terms of employment.

Employee contracts

- All employees shall be provided with a written, understandable and legally binding contract/letter. We commit to not relying on part-time, short-term or casual labourers, trainees or false apprenticeships to pay lower wages and offer fewer benefits to employees across our Group.

7. Communication and awareness of this Policy

The HR Department within each Group business will be responsible for ensuring the communication of this Policy (or their business' equivalent policy and procedures).

8. Consequences of Policy violation

As the Group's businesses operate in many countries, each of which has its unique business, legal and regulatory environment, this Policy does not define a uniform set of sanctions for failure to comply with its requirements. Any violation or potential violation of this Policy will be handled by your local HR Department in accordance with the applicable policies governing employee relations and disciplinary measures.

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However, any such case will be taken very seriously, and the Group will not hesitate to take appropriate disciplinary action (which could result in dismissal for gross misconduct) or report the incident to the relevant authorities, as appropriate.

9. Compliance monitoring, review, and continuous improvement

The applicable Divisional Lead or the CEO, as appropriate, will report any purported or potential breach of this Policy to the Group Executive Committee. The CEO will report all serious or continuous non-compliance with this Policy to the Group Audit Committee and/or ultimately the Group Board for awareness and monitoring on an ongoing basis.

The CEO in conjunction with the Group General Counsel and Company Secretary will be responsible for ensuring the suitability, adequacy, and effectiveness of this Policy and for making improvements, as appropriate. It will be reviewed and updated where necessary on at least an annual basis.

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