



**We stand strong for
Human Rights**

Human Rights Policy

June 2025
v1.4

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Purpose

Respect of human rights is one of TITAN's core principles, as reflected in our Code of Conduct. We are committed to protecting and advancing human rights and aim to promote respect of human rights within our areas of influence.

This Policy is guided by the principles provided in the Universal Declaration of Human Rights, the International Covenant of Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights (see Appendix A). It aims to enhance awareness and ensure respect of human rights throughout the Group, building on and safeguarding our reputation as a responsible corporate citizen.

Scope and Application

The Policy applies to **TITAN SA and to the entities that it owns or in which it holds a majority interest (TITAN Group)**.

The principles of the Policy are also expected to be applied by TITAN Group's partners and business associates, such as contractors and suppliers.

In implementing the Policy, we are subject to the laws of the countries in which we operate and we are committed to comply with all such applicable laws. Where our Policy, procedures and external commitments are more stringent than local laws, we operate in accordance with our standards. Where local law prohibits us from upholding certain aspects of the Policy, we comply with these local laws while seeking to apply best practice.

Your Responsibilities

Human rights issues can be encountered in any personal interaction we may have as managers, supervisors, colleagues or business partners. Therefore, all TITAN Group employees need to read, understand and make sure that their actions are in compliance with the Policy.

All TITAN Group employees are strongly encouraged to familiarize themselves with the international human rights, for example by referring to the material provided by the United Nations High Commissioner for Human Rights (OHCHR) under: www.ohchr.org and to participate in any additional training programs and workshops provided internally.

Areas where Human Rights violations may most often occur

The following is a minimum, not exhaustive, list of areas where human rights violations may occur and our corresponding position. The highlighting of this list does not remove our responsibility to safeguard all human rights listed in Appendix A.

1. Life, liberty and security

We seek to ensure a healthy and safe working environment in compliance with applicable laws and regulations as well as our internal Health & Safety Policy.

We grant healthy and safe working conditions, access to potable water, sanitary and washing facilities and, whenever necessary, decent guesthouses, dormitory facilities, canteens and facilities for food storage.

We ensure a workplace free from violence, harassment or intimidation. Security personnel is employed as needed for the protection of the company's assets and our people, operating always under specific written guidelines which follow good international practice.

2. Non-discrimination

We value diversity of the people with whom we work. We do not tolerate discrimination or harassment. We promote equal opportunities and inclusion on the basis of any characteristic including: **demographic**, such as age, gender, race,

ethnicity, physical ability, sexual orientation or national origin; **experiential**, such as skills, competences, education, talent, background and culture; and **cognitive**, such as ways of thinking, personality and style.

3. Family life

We respect and support the right of our employees to maternity and family life. We seek to improve work-life balance, providing social service support as determined by local conditions and expectations. Examples may include social benefits for the families, special programs and events addressed to the whole family, etc.

4. Freedom of association

We respect the freedom of association and the right to collective bargaining. When employees form a legally recognised association, we engage in constructive dialogue with it.

5. Child labour

We do not employ any person under 18 years of age in our operations. We can offer the possibility of apprenticeships/internships to younger persons following an internally or externally approved educational procedure.

6. Slavery and forced labour

We prohibit the use of all forms of forced or compulsory labor, including bonded labor, corporal punishment, mental or physical coercion and sexual harassment, sexual and verbal abuse.

Workers' identification documents are not withheld for any reason.

Guidance on Preventive Procedures

1. Risk Assessment

The identification and prioritization of general areas within each operation where the risk of adverse human rights impacts is most significant is the responsibility of local management. A quick human rights assessment tool (available through Group Corporate Affairs) may be utilized to support and verify the process. Human rights risk assessment differs from commercial, technical, and financial risk management in that it is not about assessing risks just to the company, but to the rights of others as well.

Such risk assessment should be performed in all our businesses and be part of the evaluation process in any merger, acquisition or substantial operational change. In addition, as situations may change, appropriate periodic reviews should also take place.

Remedial actions, where needed, should be documented and monitored.

2. Communication

Our zero-tolerance approach to human rights violations must be communicated to all suppliers, contractors, agents and business partners at the outset of our relationship with them and as appropriate thereafter.

3. Monitoring and review

Internal Audit and/or Group ESG Performance Department should monitor and review the effectiveness and implementation of the Policy.

4. How to raise concern

If you believe or suspect that a violation of a human right will occur, is occurring or has occurred, you should report it immediately to:

- Your Line Manager and/or
- Your local Legal Department or
- The reporting platform (EthicsPoint)

If you have any questions or require clarifications with regard to the Policy, please contact your line manager and/or your local Legal Department.

Violations

Any employee who violates the Policy may be subject to disciplinary sanctions, including termination of employment, according to local laws and regulations. Where an action is also in breach of the law, the employee may be subject to prosecution under civil or criminal law.

Appendix A

1. Human Rights legislation

International Human Rights Standards: The Bill of Rights

The International Bill of Rights is composed of the (1) [The Universal Declaration of Human Rights](#) which lists all human rights, and (2) the [International Covenant on Civil and Political Rights](#) and (3) the [International Covenant on Economic, Social and Cultural Rights](#) where these rights are broken down into concrete obligations for states.

Table 1: Benchmarks for corporate conduct

Civil and Political Rights		Economic, Social and Cultural Rights	Labour Rights
International Covenant on Civil and Political Rights		International Covenant on Economic, Social and Cultural Rights	8 ILO core conventions
1. Right of self-determination; 2. Right to life; 3. Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment; 4. Right not to be subjected to slavery, servitude or forced labour; 5. Rights to liberty and security of person; 6. Right of detained persons to humane treatment; 7. Right not to be subjected to imprisonment for inability to fulfil a contract; 8. Right to freedom of movement; 9. Right of aliens to due process when facing expulsion; 10. Right to a fair trial; 11. Right to be free from retroactive criminal law;	12. Right to recognition as a person before the law; 13. Right to privacy 14. Rights to freedom of thought, conscience and religion 15. Rights to freedom of opinion and expression 16. Rights to freedom from war propaganda, and freedom from incitement to racial, religious or national hatred; 17. Right to freedom of assembly; 18. Right to freedom of association 19. Rights of protection of the family and the right to marry; 20. Rights of protection for the child; 21. Right to participate in public life; 22. Right to equality before the law, equal protection of the law, and rights of non-discrimination; 23. Rights of minorities.	1. Right of self-determination; 2. Right to work; 3. Right to enjoy just and favourable conditions of work; 4. Right to form trade unions and join the trade union, and the right to strike; 5. Right to social security, including social insurance; 6. Right to a family life; 7. Right to an adequate standard of living; 8. Right to health; 9. Right to education; 10. Rights to take part in cultural life, to benefit from scientific progress, and of the material and moral rights of authors and inventors.	1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) 2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98) 3. Forced Labour Convention, 1930 (No. 29) 4. Abolition of Forced Labour Convention, 1957 (No. 105) 5. Minimum Age Convention, 1973 (No. 138) 6. Worst Forms of Child Labour Convention, 1999 (No. 182) 7. Equal Remuneration Convention, 1951 (No. 100) 8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework

Protect: the state’s duty to protect against human rights abuses by third parties, including businesses, through appropriate policies, regulation and adjudication.

Respect: the corporate responsibility to respect human rights, meaning that businesses need to avoid infringing the human rights of others and address adverse impacts with which they may be involved.

Remedy: the need for greater access to effective remedy for victims of business-related human rights abuses, through both judicial and non-judicial means.