

# Heliox Human Rights Policy



**We believe that taking care of people and the environment is fundamental to the success of our business.**

**MICHAEL COLIJN, CEO**

**Dears,**

Heliox (or “we”) have a strong focus on Compliance and Corporate Social Responsibility. We care about the impact we have on our customers, suppliers, our people<sup>1</sup> our environment and future generations to come. Part of it is taking good care of our employees and other persons we do our business with.

Heliox is committed to respect human rights (as set out in this Heliox Human Rights Policy) and to comply with the applicable laws and regulations as the legal basis of our business activity.

This Policy clearly states the expectations for how Heliox operates and applies to all Heliox companies. Besides, this Policy applies to all Heliox-employees, consultants, (sub)contractors, temporary staff, (higher) management and the board of directors.

Heliox's other Policies can be found on our Website.

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<sup>1</sup> “Heliox” means Chargeco Holding B.V. and its Affiliates, being entities that are directly or indirectly controlled by Chargeco Holding B.V.

# Statement of Commitment

Heliox is committed to meeting its responsibility to respect human rights. As a globally active company, we are moreover committed to global values and standards as well as to the applicable local laws and regulations. We are committed to the principles of the following international treaties concerning fundamental rights and recognized standards, such as:

- The Universal Declaration of Human Rights
- International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The OECD Guidelines for Multinational Enterprises
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The United Nations Guiding Principles for Business and Human Rights ("Protect, Respect and Remedy"-Framework).

We expect our employees and business partners to comply with these key guidelines and recommendations:

## I. General Compliance

### 1.1 Non-discrimination

Open and respectful behaviour towards each other is embedded in our Heliox fundamental values. Heliox is against any form of discrimination based (among others) on gender, nationality, race or colour, age, sexual orientation, marriage & civil partnership, pregnancy & maternity, disability or health choice, or belief and does not tolerate discrimination of and by its employees.

Heliox is committed to have a work environment based on dignity and mutual respect and operates a zero tolerance policy in that regard toward those who seek to undermine another's self-esteem or dignity, or those who threaten to create/condone a hostile, offensive or abusive work environment.

### 1.2 Forced Labour

Heliox shall never engage in any form of compulsory, forced, bonded, trafficked, modern slavery or non-voluntary labour. Heliox rejects any use of forced or compulsory labour as well as any form of modern slavery, including taking away another person's freedom by threats, coercion, abuse of power and severe exploitation for personal or commercial gain. For this reason, we act with special care when recruiting migrant/foreign workers or when engaging with foreign business partners.

### 1.3 No harsh or inhuman treatment / Harassment

Heliox does not accept or tolerate the use of corporal punishment, threats of violence or other forms of mental or physical coercion. Heliox shall not engage, support or allow any form of harassment or abuse in the workplace. Heliox expects its business partners to comply with this rule.

### 1.4 Child labour

Heliox does not accept or tolerate child labour and all those works that deprive children of their childhood, their potential and their dignity, and that is harmful to their physical and mental health. Heliox shall take all reasonable measures to prevent and ensure that based on International and European Law, child labour does not take place in any part of its supply chain worldwide.

## 2. Employees Rights

### 2.1 Employment relationship

Heliox recognizes the importance of secure employment for both the individual and for society through a preference for permanent, open ended and direct employment. Heliox has a clear internal regulations for recruiting and hiring people working on limited, fixed-term contracts, offering them fair opportunities for promotion. When renewing temporary employees' contracts we discuss the possibilities, provide feedback (year- end performance review) and the expectation of Heliox as well as of the employees to ensure transparency and fair opportunities.

### 2.2 Working conditions, including hours

Our employees' working conditions are in compliance with the internationally recognized basic labour standards and applicable laws of the countries where we are active. Heliox treats all employees fairly and honestly regardless of where they work. All employees have a written contract of employment, with agreed terms and conditions, including agreed hours of work and holidays in accordance with the legislation of the country where they work. All employees are entitled to reasonable rest breaks and access to rest facilities.

### 2.3 Fair wages/compensations

Every employee has a right to compensation for a regular work week that is sufficient to meet the employee's basic needs and provide some discretionary income.

Our business partners must pay at least the minimum wage or the appropriate prevailing wage, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. If the compensation paid does not meet the employees' basic needs and provide some discretionary income, our business partners are required to take appropriate actions that seek to progressively realize a level of compensation that does.

### 2.4 Freedom of association

Heliox respects the basic right of employees to freely, voluntarily and without interference establish and join, or not join, unions and employee representation of their own choice and to bargain collectively. In countries where this right is restricted by local laws, alternative legitimate options for employee participation and association are to be supported. Heliox ensures that employees are given the opportunity to discuss their working conditions with management without fear of retaliation.

### 2.5 Migrant Employees

We expect all employees, including imported and migrant workers, to be provided wages, benefits and working conditions that are fair and in accordance with local and European law. We do not condone holding employees' passports to keep them from leaving, charging any type of fee or deposit for employment, or any other unfair practice.

### 2.6 Rights of indigenous communities

The safety and good health of our employees are Heliox's highest priority. Our ultimate goal is to have and keep zero incidents. Therefore, our Health and Safety Policy aims for Heliox's commitment to provide a safe and healthy workplace. Heliox Health and Safety Policy can be found on SH&E Sharepoint and Heliox Website:

<https://www.heliox-energy.com/resources/corporate-social-responsibility>

## 3. Our Business Partners & Compliance

We do not only select our partners according to business criteria alone. Environmental protection, occupational health and safety and social standards as well as compliance with this Policy, are also part of the evaluation of new and existing relationships and are embedded in the Heliox policies. This worldwide applicable Heliox Codes of Conduct and/or Compliance Policy is the basis of the contractual relations.

## 4. Implementation and Monitoring

Open and respectful behaviour towards interest groups is embedded in our fundamental values. Heliox's aspiration towards excellent business performance requires the embedding of conduct that is legally and ethically correct. For this reason, the Managing Board approved Compliance Framework and policies, which are binding for all employees. These documents specify our values which represent high ethical and legal standards and apply to all business activities - from strategic planning to everyday business.

An important prerequisite for the successful implementation of the policies are compliance trainings for employees, which we provide on annual basis. Moreover, we offer our employees points of contact where they can ask questions and seek advice and help.

If any employee believes that someone is violating this Human Rights Policy or the law, they are asked to report it immediately to their line manager or Heliox Legal.

We also promote human rights awareness and respect along our commercial chain, including the adoption of legal contractual clauses. In the event of disrespect to human rights, duly proven by government authorities and mechanisms provided by legislation, we notify our business partners thereof, so they may adopt corrective measures and, in cases in which such measures are not taken, we then are entitled to rescind the respective commercial relationship.

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