

HUMAN RIGHTS POLICY

NES Fircroft recognise our responsibility as a company to respect human rights and we are committed to conducting business in a manner that ensures all people are treated with dignity and respect and complies with all legal requirements.

NES Fircroft operates in countries where there are numerous regulations addressing human rights issues and there is low risk of human rights abuses, however we recognise our responsibility as a company to respect human rights and shall conduct business with integrity and responsibility.

This policy outlines the key human rights principles which guide our business practices which have been guided by the International Labour Organisations (ILO) standards, the Universal Declaration of Human Rights, and the Ethical Trading Initiative Base Code.

Where NES Fircroft identifies that we have directly or indirectly contributed to negative impacts on the human rights of others, we will actively engage in remediation of such impacts through legitimate processes.

NES Fircroft will make this policy available to all employees and will periodically provide training on topics covered within this policy. This policy will be subject to regular review.

1. RESPECT FOR HUMAN RIGHTS//

NES Fircroft will not take part in any human rights abuses and will not be complicit in any activity that solicits or encourages human rights abuses. NES Fircroft will promote respect for, and protection of, human rights and we expect all employees, suppliers and stakeholders to uphold the same standards and abide by the principles of this policy. NES Fircroft will carry out a due diligence process for suppliers based on relevant issues, including human rights, and we will contractually require that all suppliers adhere to this policy.

2. EQUALITY AND DIVERSITY//

NES Fircroft will treat every individual who works for and with us fairly and without discrimination, in conformance with all applicable laws and regulations. No person is to be unfairly disadvantaged, favoured or ostracised because of irrelevant characteristics such as race, nationality, gender, age, pregnancy, disability, union membership, religion, family status, sexual orientation or any other unlawful criterion. Such discrimination will not be tolerated.

3. FAIR WAGES & WORKING CONDITIONS//

All NES Fircroft employees and placed personnel will be provided a written contract of employment with agreed terms and conditions, including notice periods. Working hours comply with national laws and benchmark industry standards, and all overtime is voluntary. Individuals are free to leave their employment and/or terminate at any time in accordance with the defined notice periods.

With our compensation and benefits we aim to provide an adequate standard of living for our employees and their families. All employees are entitled to rest and leisure, including paid holiday, and the right to family life, including parental leave and comparable provisions in accordance with the legislation of the country where they work.

All employees are provided with appropriate job skills training in order to help them fulfil their potential.

This document and the information contained is controlled as part of the NES Fircroft Integrated Management System in accordance with international ISO standards, and as such is confidential to NES Fircroft. The document must not be distributed outside of the business or disclosed to any third party without written consent from the Director of Risk. Controlled versions are available via SharePoint; any printed versions of this document are deemed uncontrolled and therefore may not contain the most up to date information available. Any amendments should be addressed to the Head of Quality and Data Protection.

Compensation to individuals for work services shall comply with all applicable local laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

Deductions are applied in accordance with local law and the engagement type. Deductions from wages as a disciplinary measure shall not be permitted. NES Fircroft do not charge for or make deductions associated with recruitment fees. Individuals are provided with a timely payment statement that includes sufficient information to verify accurate compensation for the work performed.

NES Fircroft do not hold or otherwise destroy, conceal, confiscate, or deny employees access to their identity or immigration documents, such as a government-issued identification, passport, or work permit unless such holdings are required by law.

4. FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING//

NES Fircroft is committed to open and constructive dialogue with our employees and recognises and respects employees' right to, form, join or not to join associations and choose representative organisations for the purpose of engaging in collective bargaining without fear of reprisal or intimidation. NES Fircroft will cooperate in good faith with our employees representative organisations within the appropriate national legal frameworks. Employees who act as representatives are neither disadvantaged nor favoured in any way.

5. HEALTH AND SAFETY//

NES Fircroft provides a safe and healthy workplace and complies with all applicable health and safety laws and regulations. Each employee has a duty to take reasonable precautions to maintain a safe and healthy working environment in order to avoid risk or injury to themselves or others. Strict adherence to the NES Fircroft [Health and Safety Policy](#) is expected of all employees.

6. FORCED LABOUR AND HUMAN TRAFFICKING//

Personal integrity and responsibility are the foundation of our business; we differentiate our solutions on the basis of compliance, integrity and responsibility, and in accordance with local and international laws. Within this context, NES Fircroft will not accept any practices involving slavery, servitude, forced or compulsory labour, or human trafficking. We will continue to work to fully understand the risks involved and to ensure such practices are not taking place within our business, that of our partners or the ensuing supply chain.

NES Fircroft's approach to tackling modern slavery is defined within our [Modern Slavery statement](#).

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7. CHILD LABOUR//

NES Fircroft does not employ child labour and we do not use suppliers which employ child labour. All NES Fircroft employees are above the legal employment age in the country of their employment. Onboarding practices include verification of government approved identification and/or eligibility to work documentation encompassing data of birth. If child labour is discovered during any audit, appropriate remedial steps will be taken with the best interest of the child in mind.

8. INHUMANE TREATMENT & HARASSMENT//

No person will be subject to any cruel, inhumane, or degrading treatment or punishment. Individuals are entitled to work in an environment and under conditions that respect their rights and dignity. We expect our employees to be respectful, professional, and fair in their dealings with all colleagues and third parties. Harassment of any kind, whether physical, verbal or psychological, will not be tolerated.

NES Fircroft's expectations are defined with our [Acceptable Behaviour Policy](#)

Further Information

Any queries relating to this policy should be directed to the Risk & Compliance team at risk@nesfircroft.com.

If any individual suspects that a human rights abuse is taking place within NES Fircroft or by one of our suppliers, business partners, or other external parties connected with NES Fircroft, they should report it immediately. Such instances can be reported through our [Business Incident procedures](#), or confidentially and anonymously via the NES Fircroft Whistleblowing Portal: <https://nesfircroft.integrityline.com/frontpage>.