



Human Rights Policy

At 3B Fibreglass, we strongly believe that companies have a key role to play in respecting and promoting people's rights and freedoms, consistent with our engagement to be part of the solution for a sustainable world, for people and with people.

Human Rights Principles

3B is committed to respecting internationally recognised Human Rights Principles as set out in the International Bill of Human Rights, consisting of:

- the Universal Declaration of Human Rights;
- the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights; and in
- the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work.

We emphasise treating individuals with dignity and respect inside our organisation and throughout our value chain. We commit to complying with all applicable state, national, and international laws, rules and regulations relating to ethical and responsible standards of behaviour, including those dealing with human rights (including, without limitation, child labour, forced or compulsory labour, human trafficking and slavery and conflict mineral sourcing), environmental protection, sustainable development and bribery and corruption, as well as any legislation or regulation implementing the Principles. We emphasise treating individuals with dignity and respect inside our organisation and throughout our value chain.

We ensure not to be complicit in human rights abuse (United Nations Global Compact Principle 2) by implementing due diligence as required by the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs). We commit to continuously reviewing and updating policies and procedures to proactively identify, address and respond to unfavourable human rights impacts with which we could possibly be involved in. We use due diligence as a means to identify and prevent human rights risks to people in our business and value chain. We are dedicated to complying with pertinent laws and implement controls wherever we operate.

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Diversity, equal opportunity and inclusion

At 3B we value and advance the diversity and inclusion of the people with whom we work. We are committed to ensuring equal opportunity to all and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, colour, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable laws. Recruitment, hiring, placement, development, training, compensation and advancement at 3B are solely based on qualifications, performance, skills and experience. We do not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is strongly combated in the workplace and in any work-related circumstance outside the workplace.

Working conditions and career development

3B aims to create an environment that allows individuals to excel, be creative, take initiatives, seek new ways to solve problems, generate ideas and opportunities, be accountable for their actions, listen to others' opinions, seek and provide feedback and be recognised for their contribution and teamwork.

We strive to provide optimal working conditions to our employees, enabling them to balance work and home life, thanks to flexible working arrangements, provided they are compatible with the needs of the business and the relevant local policy. Family leave is available to eligible staff in compliance with local legislation.

As part of our 3B Human Resources policies and practices, we offer development opportunities to our staff, in line with their abilities and wishes as well as business needs. Relevant support is provided whenever possible, for example in the form of training and coaching, which we believe to be essential to develop the skills, knowledge and behaviours of employees, provided they are responding to company needs.

The review of individual employee performance is undertaken by regular appraisals, which play a fundamental role in increasing productivity, morale and self-esteem in the workplace.

We make sure to provide competitive compensation to our employees, relative to the industry and local labour market, and in accordance with the terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws, non-discrimination and we pay close attention to the living wage threshold. Overtime is determined in accordance with business needs and in accordance with the relevant laws and regulations of the countries where 3B operates.

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Labour Relations & Freedom of Association and Collective Bargaining

3B provides a workplace that respects and values all employees and maintains an environment of open and direct communication. We strive to develop mutually rewarding relationships with employees through fairness, trust and integrity.

We fully respect our employees' right to join, or not to join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives and to bargaining in good faith with such representatives.

We comply with all applicable domestic laws and the ILO core labour principles concerning freedom of association and collective bargaining, non-discrimination, forced labour, and underage workers in the workplace (UN Global Compact Principles 3, 4, 5).

Workplace Health and Safety

At 3B, we promote a safe workplace for all.

More information related to 3B's workplace health and safety commitments can be found in our *Occupational Health and Safety Policy*.

Community engagement

3B's sites are important players in the regions where we operate and strong links exist with the local populations and authorities. We work to provide information about our activities, footprint and projects, and to share our expertise whenever relevant. 3B commits to open dialogue with all stakeholders and participation in community engagement activities, with a specific focus on health and safety related topics.

Responsible Sourcing & Sustainable procurement

Our Suppliers represent a critical component of our proposition of high performance and value as well as of our potential impact on human rights.

To actively engage its suppliers in its journey towards sustainability and quality, 3B has defined a *Supplier Code of Conduct*, valid for all 3B suppliers worldwide. The *Supplier Code of Conduct* forms the foundations for the cooperation between 3B and its suppliers towards the goal of achieving its quality, sustainability and performance objectives. Although this *Supplier Code of Conduct* only applies to 3B's direct suppliers, 3B requires its suppliers to invite their own suppliers to comply with those terms.

We expect our suppliers to treat their employees and to interact with communities in a manner

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that respects human rights and is consistent with the spirit and intent of this Code. As a minimal standard, we require that our key suppliers adhere to all applicable domestic laws and encourage them to be consistent with ILO core labour principles. We also engage with our key suppliers to reinforce awareness of potential issues pertaining to human rights, social, environmental and quality topics, and to identify further opportunities to improve responsible business practices.

When selecting suppliers, our decisions are not based solely on economic criteria. Both new and existing suppliers are also evaluated on the basis of environmental protection, occupational safety, social standards and compliant behaviour, and these standards are incorporated in our procurement conditions.

Data protection

Everyone has rights with regard to how their personal information is handled. During the course of our activities 3B will collect, store and process personal information data, and we recognise the need to treat it in an appropriate, lawful and safe manner. The information, which may be held on paper or in a digital format, is subject to legal safeguards in the relevant jurisdictions based on data protection laws including General Data Protection Regulation (GDPR).

3B treats all personal data related to its staff members and other stakeholders with the utmost care, confidentiality and security, in compliance with the GDPR. All 3B employees must actively contribute to the respect of the GDPR, adhere to its philosophy and ethics regarding any processing of either personally identifiable information or sensitive personal information.

For more information, please refer to 3B's *Data Protection* and *Data Breach Policies*.

Business ethics

3B takes pride in conducting its business in accordance with applicable laws, rules and regulations as well as with the highest standards of business ethics and ethical conduct. 3B's commitment to ethical and lawful business conduct is a fundamental, shared value of its Board of Directors, management and staff, and is considered to be critical to the Company's success. These standards for business conduct provide that everyone working at 3B will uphold ethical and legal standards vigorously as the Company pursues its financial goals, and that honesty and integrity will not be compromised anywhere at any time. These standards are not voluntary but mandatory: they are stated in our *Business Code of Conduct*, to which employees must formally adhere as a condition for employment.

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3B is committed to ensure that:

- no conflict of interest arises when employees are making business;
- no employee is involved in money-laundering or corruption;
- all employees endeavour to deal fairly with customers, suppliers, competitors and employees;
- no employee may take unfair advantage of customers, suppliers, competitors or employees through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice;
- gifts or entertainment in any form that is likely to result in a feeling of expectation of personal obligation should not be extended or accepted;
- in the conduct of business relationships, we must take every reasonable precaution to avoid indulging in practices that go against competition laws.

For more information, please refer to 3B's *Business Code of Conduct*.

Environment

We support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies (UN Global Compact Principles 7, 8, 9).

For more information related to our environmental commitments please refer to 3B's *Environment Policy*.

Grievance & Whistleblowing

3B takes the necessary measures to allow staff and all stakeholders to express their concerns or complaints, whether these concern them personally or relate to the public interest. We take care to provide accessible and secure channels of communication for those wishing to speak up and to protect them from retaliation. We examine every report carefully and take action to remedy any issues raised.

For more information, please refer to 3B's *Whistleblowing Policy*.

This policy applies to all 3B sites. The Company also expects its suppliers and any other business relation to uphold these principles and urges them to adopt similar policies within their own businesses. The Human Rights Policy is overseen by the Board of Directors and the Chief Executive Officer.

10 June 2023
Ludovic PIRAUX, CEO