



Human Rights Policy

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Table of contents

Introduction of the Policy..... 3

 Commitment to Responsible Business Conduct 3

Application of the Policy..... 3

Summary of the Policy 4

 Governance and Oversight..... 4

 Saliency Assessment..... 4

 Diagnosing and Assessing Impacts 4

 Grievance mechanism 5

 Addressing Risks and Impacts 5

 Continuous Improvement and Disclosure..... 6

 Stakeholders Engagement Strategy..... 7

 References 7

Policies on Salient Human Rights Risks 7

Training, Monitoring and Review 10

Version History 10

Introduction of the Policy

This Human Rights Group Policy (the “Policy”) sets out Solina’s expectation that all Solina’s Businesses and Employees as well as the whole value chain respect Human Rights. This means that they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.

Human Rights are rights, freedoms and standards of treatment regarded as belonging to all persons.

Commitment to Responsible Business Conduct

For Solina it is strategic commitment to respect and support internationally recognized human rights, and this Policy is guided by the principles found in the U.N. Guiding Principles for Business and Human Rights (UNGPs), Universal Declaration of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work.

Solina respects human rights, and we are committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities before or if they occur through human rights due diligence and mitigation processes.

In line with our Sustainable Sourcing Policy, Solina expects our suppliers to review our Human Rights Policy and develop their own commitments to respect Human Rights throughout their own operations.

Solina will not engage in activities that have unacceptable risks, and such risks will be identified as early as possible with a view to facilitating timely and appropriate actions. We will seek to avoid methods of operation which give rise to human rights risks where there are suitable alternatives available and will endeavor, within our remit, to ensure our clients and supply chain strive for positive options.

We will adopt systems which allow us to measure the impact of our work on human rights of our employees and contract workers, customers, workers in our supply chain, communities around our operations and consumers of our products with a view to minimizing any negative impact.

Application of the Policy

This Policy applies to all Solina’s subsidiaries (“Solina”) and to all employees, including directors, officers, independent contractors and other persons subject to an employment-type relationship with Solina employees, as well as business partners.

Solina not only commits to uphold the highest standard of Human Rights as set out in the UN SDG’s but also pledges to be a positive advocate of them through the food value chain in which it operates and relies upon.

Solina is also committed to ensuring that people are treated with utmost dignity and respect and its Human Rights Policy has been developed in conjunction with both its Sustainable Sourcing Policy and Code of Ethics.

Our mission is to integrate Human Rights Policy into Solina’s core business processes in every country we operate. Together with our stakeholders all over the world our commitment is to make sustainability a way of life. Accordingly, our CEO has signed up to our commitment.

This policy will be monitored through regular auditing and/or workplace inspections as appropriate. Supplier on-boarding assessments will ensure human rights are adequately respected and their ongoing audit and/or review will ensure continued compliance with this policy.

This Human Rights Policy applies wherever Solina does business.

Summary of the Policy

Governance and Oversight

The Executive Team is accountable for the implementation of this commitment. The Sustainability Board is responsible for overseeing human rights due diligence as one of its sustainability integration topics and assigns functional responsibility within Solina for HRDD management.

Saliency Assessment

Solina will maintain an updated assessment of our salient human rights risks, based on severity and likelihood, according to geographic, sectoral and other relevant risk factors. We will update this assessment in response to major business changes and at least every 36 months. As major business changes are to be considered: entry into new countries or markets, M&A, divestments, or restructuring, new or significantly changed suppliers or sourcing regions, changes in labor models (e.g. agency work, migrant labor), serious incidents, allegations, or grievances, major legal or regulatory developments (e.g. EU CSDDD, national due diligence laws).

Solina will use the Saliency Assessment to prioritize diagnostic activities and initiatives to cease, prevent or mitigate salient risks, and communicate publicly on how we address salient human rights risks.

Mergers and Acquisitions (M&A) are to be considered major business changes requiring an assessment of salient human rights risk. If this assessment flags high human rights risks, diagnostic activities and/or initiatives to address these risks are to be included in the M&A due diligence and integration plan.

Diagnosing and Assessing Impacts

The Regional management structure and central Human Resources and Health Safety and Environment (HSE) functions are responsible for sharing data relevant to human rights, such as diversity and safety incident data, with the Sustainability team.

Each Solina Site is responsible for their SEDEX SAQ and/or responding to an annual self-assessment questionnaire to assess their HRDD maturity and gain an indication of their human rights risks.

Target

90% response rate to self-assessment questionnaire by 2026

Solina will ensure that 10% of Sites receive an internal Human Rights audit annually, based on risk as identified in the Saliency Assessment, through the self-assessment questionnaire or in response to concerns raised through the grievance mechanism.

Target
10% of Sites receiving internal Human Rights audit by 2027

Solina will ensure that all Sites identified as high risk receive an in-depth third-party Human Rights assessment annually.

Target
100% of Sites identified as high risk receiving adequate audit and training within a year

Grievance mechanism

Solina will maintain an effective grievance mechanism for both own employees and supply chain workers in accordance with UNGP 31 criteria, with the option of reporting anonymously.

Grievances qualifying as whistleblowing under national legislation will be handled in accordance with relevant legislation.

We aim to investigate all reports within 48-72 hours.

Target
90% on-time investigation of grievances by 2026

Addressing Risks and Impacts

To the extent that Solina’s activities give rise to risks or impacts, we will cease or minimize those activities where there are suitable alternatives available. Where it is not possible to cease activities giving rise to risks or impacts, we will take action to mitigate this. To the extent that individuals or groups may be harmed by Solina’s activities, we will remediate that harm.

Solina is committed to a responsible approach when disengaging from business relationships. Exiting a supplier or partner relationship shall only be considered after all reasonable efforts to remediate identified human rights risks or impacts have been undertaken. Where disengagement is necessary, Solina will apply principles of responsible exit to minimize adverse impacts on workers and communities, ensuring transparency and fairness throughout the process. This process is detailed in Solina Responsible Exit Procedure, SOL.PROC 25.02.

To the extent that the activities of our value chain partners give rise to risks or impacts, we will use our leverage to ensure they cease or minimize those activities where there are suitable alternatives available. Where it is not possible to cease activities giving rise to risks or impacts, we will use leverage to ensure they mitigate this. To the extent that individuals or groups may be harmed by the activities of our value chain partners, we will use leverage to ensure they remediate that harm.

Where suppliers are found responsible for adverse human rights impacts, Solina will require them to remediate those impacts in line with their share of responsibility. Solina will monitor remediation actions through assessments, grievance follow-up, and dialogue. Where necessary, Solina will provide guidance or facilitate collaboration to ensure meaningful remediation is achieved.

We will develop group-level initiatives to address salient risks identified in the Saliency Assessment.

Target

Initiatives implemented to address all ‘high’ and ‘critical’ salient risks at group level by 2030

All Solina Sites are responsible for addressing all issues identified in human rights assessments as well as verified grievance incidents within the timeline agreed with the auditor or grievance investigation manager.

Solina recognizes that certain human rights risks are influenced by systemic external factors beyond our direct control. Where appropriate, Solina will actively collaborate with industry peers, multi-stakeholder initiatives, and sectoral platforms to address root causes of salient risks (for example, risks linked to agriculture, women’s empowerment, or migrant worker conditions). Through collective action, Solina aims to leverage broader change in the environments where we operate and source.

Continuous Improvement and Disclosure

Solina will track the HRDD process and outcomes through appropriate qualitative and/or quantitative metrics. Results will be reported yearly to the Executive team and annually in Solina’s public Sustainability Report.

Solina will establish and continuously improve information management systems to track and analyze human rights data across operations and the supply chain. This includes risk-tracking tools, contract management, and supplier engagement records. Data insights will be used to inform saliency assessments, supplier due diligence, and ongoing monitoring. We will review the adequacy of these systems annually and implement improvements as needed.

Solina aims for continuous improvement in HRDD. The Sustainability Board is responsible for an annual learning review of HRDD, implementing adaptations to Solina’s HRDD approach as needed.

Stakeholders Engagement Strategy

We will engage meaningfully with stakeholders, including affected rightsholders.

STAKEHOLDER GROUP	ENGAGEMENT APPROACH
Our workforce and their legitimate representatives	• Are provided adequate information on company decisions and activities that may affect them through quarterly social dialogue meetings. • Are invited to provide feedback on their working conditions and company decisions and activities that may affect them during quarterly social dialogue meetings and through the employee survey. • Have access to Solina’s grievance mechanism to raise impacts that may affect them and receive adequate information on the process of their cases. • Provide feedback on their working conditions and impacts that may affect them during worker interviews as part of human rights assessments.

STAKEHOLDER GROUP	ENGAGEMENT APPROACH
Value chain workers and their legitimate representatives	• Have access to Solina's grievance mechanism to raise impacts that may affect them and receive adequate information on the process of their cases. • Provide feedback on their working conditions and impacts that may affect them during worker interviews as part of human rights assessments.
Our end users and their legitimate representatives	• Have access to Solina's grievance mechanism to raise impacts that may affect them and receive adequate information on the process of their cases.
Our customers, investors, suppliers and business partners	• Have access to adequate information on Solina's risks, impacts and HRDD activities (including key metrics and targets) in the annual Sustainability Report. • May request additional information as needed to meet their own HRDD objectives.
Other stakeholders including NGOs, press and regulators	• Have access to adequate information on Solina's risks, impacts and HRDD activities (including key metrics and targets) in the annual Sustainability Report. • May request additional information as needed.

References

- The United Nations' Universal Declaration on Human Rights
- The European Convention on Human Rights
- The Ten Principles of the UN Global Compact
- The OECD Guidelines for Multinational Enterprises — <http://www.oecd.org/daf/inv/mne/48004323.pdf>

Policies on Salient Human Rights Risks

Through its risk mapping exercise, Solina has focused on the Human Rights that are most at risk due to the severity of impact and likelihood of occurrence at a Global, Country, Site and Product level.

The policies and requirements below constitute Solina's focus areas based on the risk mapping exercise:

- Occupational Health and Safety
- Forced Labor and Human Trafficking
- Diversity and Equal Opportunity
- Freedom of Association and Collective Bargaining
- Work Hours, Wages and Benefits
- Child Labor

HUMAN RIGHT	WHY IS IT IMPORTANT AND WHAT IS OUR GOAL?	POLICY REQUIREMENTS	REFERENCE
Occupational Health and Safety	• Human Rights start with ensuring the health and wellbeing of all our Employees in their place of work • The Occupational Health and Safety of all our employees from our production sites to our labs and our offices is of paramount importance – we want to ensure everyone returns home safely to their	• We provide a safe and healthy workplace to comply with applicable H&S laws, regulations and internal requirements in order to maintain a productive workplace by minimizing the risk of accidents, injury and exposure to health risks • We are committed to engaging with our teams to continually improve health and safety in our	• Ten Principles of the UN Global Compact • ILO convention 155 on occupational health and safety • OHCHR The human right to safe and healthy

HUMAN RIGHT	WHY IS IT IMPORTANT AND WHAT IS OUR GOAL?	POLICY REQUIREMENTS	REFERENCE
	families at the end of every day • Our goal is zero harm to our employees, their families, the communities in which we operate, our business partners and customers • As such, it is mandatory that we provide a safe, healthy and secure workplace and strive for continuous improvement to achieve and maintain best in class health, wellbeing, safety and security standards	workplace, including the identification of hazards and remediation of H&S issues • We are committed to maintaining a workplace that is free from violence, harassment, and other unsafe or disruptive conditions due to internal and external threats. Safeguards are provided as needed and will be maintained with respect for privacy and dignity	working conditions
Forced Labor and Human Trafficking (Modern Slavery)	• We are aware that instances of modern slavery in operations and supply chains are on the rise • We strive to make this a point of evaluation when auditing and reviewing practices across our business, temporary worker providers and wider value chain	• The use of all forms of forced labor, including prison labor, indentured labor, and any form of human trafficking is prohibited	• ILO Conventions 29 and 105 on forced labor • Ten Principles of the UN Global Compact
Diversity and Equal Opportunity	• We deeply believe in a working environment that sees the differences between us as a strong and positive part of our ability to serve our markets • We believe that ensuring a work environment where all our colleagues feel they belong will accelerate innovation that will advance our business • Our diverse origins and strong entrepreneurial success is built on the diversity of different companies, with different people from different backgrounds who think and work in different ways	• Create a culture of inclusivity and ensure a work environment where everyone is respected, heard and valued • We value the diversity of our people, people we work with and the contributions they make. We have a longstanding commitment to equal opportunity and intolerance of discrimination and harassment • We are dedicated to maintaining a workplace that is free from discrimination or harassment on the basis of race, sex, color, national or social origin, religion, age, disability, sexual orientation, political opinion or any other protected characteristics.	• The United Nations' Women Empowerment Principles • ILO Convention 111 on discrimination • ILO Convention 100 on equal remuneration • Ten Principles of the UN Global Compact
Freedom of Association and Collective Bargaining	• The rights to freedom of association and collective bargaining are referred to as "enabling rights" as they can assist with realizing decent working conditions but can also contribute to economic and social development • We recognize that bargained agreements can play a positive role in enhancing employees' engagement and company's performance by contributing to the wellbeing of individuals	• The Company respects our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment • Where a team member is represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. We are committed to bargaining in good faith with such representative.	• ILO Conventions 87 and 98 on freedom of association, protection of the right to organize and collective bargaining • Ten Principles of the UN Global Compact
Work Hours, Wages and Benefits	• We want to protect the health of our employees by ensuring they are working within the	• Respect legal requirements related to working time and paid time off, while adopting	• ILO Convention 1 on working hours

HUMAN RIGHT	WHY IS IT IMPORTANT AND WHAT IS OUR GOAL?	POLICY REQUIREMENTS	REFERENCE
	legally established working time • We want to ensure the safety and long-term wellbeing of our employees by ensuring they enjoy and benefit from paid annual leave • We want to attract, motivate and retain the best talents through a competitive base salary, reflecting the responsibilities, job characteristics, experience and performance	more industry best in class standards where possible • Compensate competitively relative to the industry and local labor market. • Operate in full compliance with applicable wage, work hours, overtime and benefits laws	• The Minimum Wage Fixing Convention 131
Child Labor	• Child labor is work that deprives children of their childhood, their potential and dignity, and that is harmful to physical and mental development • It is a major challenge for all Food processors to identify child labor and an obligation to eliminate where detected	• At Solina, the hiring of individuals that are under 16 years of age for all positions, and under 18 years of age for positions in which hazardous work is required, is prohibited • Assessment of Child Labor risk is to be included in all supplier audits where product is being sourced from at countries identified as at risk • Verifiable documentation of each employee's date of birth or some legitimate means of confirming each employee's age must be maintained, as required by law	• Ten Principles of the UN Global Compact • The United Nations' Convention on the Rights of the Child • Convention C138 – Minimum Age Convention, 1973 (No. 138)

Training, Monitoring and Review

Training on this Policy will be organized regularly in order to ensure full understanding of the principles for all relevant Solina's employees.

Solina will monitor the implementation of this Policy and will review on an ongoing basis the Policy's suitability and effectiveness. Internal control systems and procedures will be regularly audited to ensure that they are effective in minimizing the risk of non-compliance with this Policy.

Version History

Version	Date	Author	Approval	Level of Confidentiality
2	December 2025	Solina Group/HR	Group CEO / Group Legal Director	Public document for internal and external use