

Human rights due diligence policy

Objective

The purpose of the policy is:

- a) Reinforce the commitment to human rights as outlined in the Gurit Code of Conduct and the Supplier Code of Conduct.
- b) Reaffirm the respect for human rights throughout our entire value chain—both upstream and downstream—as well as within our own operations, while providing additional details on our internal human rights commitments and due diligence process.

Related documents

- Gurit Code of Conduct https://www.gurit.com/wp-content/uploads/2023/05/Code-of-conduct_GURIT_rev2023.pdf
- Social Policy <https://www.gurit.com/wp-content/uploads/2023/05/Social-Policy-GURIT.pdf>
- Supplier Code of Conduct <https://gurit.com/wp-content/uploads/2022/12/Gurit-Supplier-Code-of-Conduct.pdf>
- Report-a-concern policy <https://www.gurit.com/wp-content/uploads/bsk-pdf-manager/2023/08/Gurit-Report-a-concern-policy.pdf>

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1- Human rights commitment

Human rights are fundamental rights and freedoms to which all individuals are entitled, regardless of nationality, gender, ethnic origin, race, religion, language, or any other status.

Our commitment to upholding human rights, as well as the Gurit Values & Principles, is detailed through our Code of Conduct, Social Policy, Supplier Code of Conduct, and whistleblowing policy (the "Report-a-Concern Policy").

According to the Code of Conduct "Gurit is committed to human rights and individual rights and to enforcing equal employment opportunities regardless of sex, race, colour, national origin, age, health or any other discrimination criteria and we apply fair employment practices across the whole organisation.

We will not tolerate any form of discrimination, humiliation, oppression, harassment or offence. In particular, we strictly condemn sexual harassment and bullying. We categorically reject the use of child and forced labour."

2- Human rights reference framework

Gurit strives to work ethically, considering human rights as well as the social impacts of how we conduct business. We believe that Gurit should not only comply with all applicable legislation and in cases where no relevant legislation exists, the company should ensure it carries out best practices anyway.

Our commitment to ethical standards is reflected in our efforts to act in accordance with international frameworks and soft laws, including the following regulations:

- International Labor Organization (ILO) and its fundamental principles and rights at work Conventions
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Ten Principles of the UN Global Compact (UNGC)
- Universal Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- ISO 45001 Occupational Health and Safety Management System Standard
- ISO 14001 Environmental Management System Standard

3- Gurit due diligence process

Our framework for human rights due diligence is established in line with the OECD Guidelines and the United Nations Guiding Principles. Gurit's due diligence process for protecting human rights for its employees and business partners includes:

- **Policy commitment.** Gurit's company's commitment to respecting human rights is demonstrated through the Gurit's Code of Conduct, approved by the Board of Directors and CEO, the Social Policy, the Gurit Supplier Code of Conduct, and these Gurit Human Rights Due Diligence Policy.
- **Human rights risk and impact assessment.** Gurit identifies human rights risks and impacts through a systematic risk and impact assessment. This process involves regularly assessing actual and potential human rights risks across the entire value chain, including both upstream and downstream operations. Gurit prioritizes areas linked to the most serious harms, identifies vulnerable groups, and maps potential impacts. This thorough evaluation enables Gurit to develop targeted strategies to prevent and mitigate risks and protect human rights effectively.
- **Risk-based measures.** Gurit identifies and prioritizes potential risks to determine salient human rights issues. For each salient risk, Gurit assesses the impacts, identifies affected stakeholders, and establishes specific targets. This approach enables Gurit to implement effective risk-based measures aimed at concluding, preventing, or mitigating any human right impacts.
- **Embedding respect for human rights.** Gurit embeds respect for human rights by integrating human rights due diligence into its strategies, policies, and processes across all departments. This includes providing a due diligence and human rights training.
- **Track and communicate.** Gurit monitors the effectiveness of its human rights measures by monitoring human rights-related activities implementation and associated Key Performance Indicators (KPIs). Gurit reports on relevant human rights initiatives and these KPIs in the annual Sustainability Report, which outlines value chain's due diligence obligations, detailing processes from detection to remedy. This report, approved by the Board of Directors, ensures accountability and transparency regarding actual and potential impacts.
- **Grievance and remedy mechanism.** Gurit is committed to taking timely and transparent action to provide remedy and dialogue to solve the human right impact. Therefore, the company has established an effective grievance mechanism that encourages stakeholders to report human rights concerns.

Every concern regarding compliance with our Code of Conduct or human rights regulations is taken seriously and investigated objectively by an independent organization. Reports can be submitted anonymously to ensure confidentiality.

If an allegation is substantiated, appropriate remedial measures will be implemented to avert or mitigate negative impacts.

The Gurit report-a-concern platform is accessible via our public website: <https://www.gurit.com/report-a-concern/> .

4- Gurit salient human rights topics

Gurit has identified the following human rights at risk of experiencing the most severe negative impacts across the company's operations and value chain, based on a risk assessment conducted in 2024.

Gurit's upstream and downstream value chain	Gurit's own operations
Health and Safety	Health & Safety
Forced labour & modern slavery	Working conditions
Working conditions	Discrimination
Discrimination	Security forces
Environmental	

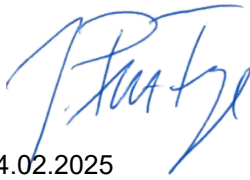
5- Implementation and relevant stakeholders for this guideline

This guideline applies to all sites within Gurit and is implemented under the responsibility of the respective Site Manager. All sites must ensure that their employees respect human rights. Gurit also requires its business partners across the entire upstream and downstream value chain to uphold human rights standards. We communicate this requirement whenever possible in our contracts, ensuring they accept or acknowledge our Supplier Code of Conduct.

This guideline is applicable to all Gurit employees, contractors, and external workers, as well as business partners engaging with Gurit along the value chain. Everyone is expected to comply with this guideline, as well as applicable national and international legislation, local customs, and best practices. Gurit expects its customers, suppliers, business partners, and other parties directly connected to its operations, products, and services to respect human rights as outlined in this guideline.

Stakeholders are encouraged to share concerns, complaints, or observations with the Global Sustainability Team (sustainability@gurit.com).

6- Contacts

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