

# FERREXPO PLC

## HUMAN RIGHTS POLICY

Adopted by the Board on 3 December 2021.

### POLICY STATEMENT

The purpose of the Policy is to establish Ferrexpo's commitment to respect human rights and freedoms. We support the principles defined in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises.

This Policy applies:

- at every level of Ferrexpo and extends to all partners, employees (including full-time, part-time, temporary, probationary, casual and contract staff) and students;
- to every aspect of the employment relationship, including recruitment, selection, promotion, transfers, training, salaries, benefits, discipline and performance appraisals; and
- to any subsidiary company and to all operations regardless of geographic location.

### COMMITMENT

We conduct our business in a manner that respects the rights and dignity of all people, complying with all legal requirements.

We respect the human rights of all employees. We expect all employees to be treated without discrimination for factors such as race, religion, national origin, colour, sex, sexual orientation, gender identity or expression, age, disability, health state or vaccination status. We seek to provide safe workplaces. We recognize the rights of our employees to freedom of association and collective bargaining. We select and promote our people on the basis of their qualifications and merit, encouraging diversity.

We respect the rights of individuals belonging to groups or populations which may be particularly vulnerable to adverse impacts, including: indigenous people; women; national or ethnic, religious and linguistic minorities; people with disabilities; migrant workers and their families.

We believe that women's rights and economic inclusion are priorities to win long-term. We recognize that women are integral to our business model and growth ambitions. Our approach starts with the respect of the rights of women and extends to their promotion as well as helping to develop skills and open up opportunities.

We will not tolerate harassment or any form of forced, compulsory or child labour.

We apply the provisions of this Policy to our business partners, suppliers and vendors.

We want to work with business partners that share our commitments to human rights, safety and ethics and compliance and we encourage our suppliers to follow our commitment to human rights and require them to contractually agree where possible.

If there are identified human rights breaches in relation to a customer, supplier, contractor, vendor, agent or any other person undertaking work on behalf of Ferrexpo and there is no clear commitment to corrective action, persistent inaction, or a lack of improvement, then our work with that person or entity shall cease immediately.

Where people in local communities may be affected by our activities, we seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them. To support this, we provide guidance to our businesses and projects on engaging with local stakeholders, managing the process of receiving and responding to community complaints.

With respect to the workforce within Ferrexpo and entities in its supply chain, we do not permit the employment of child labour, nor do we allow forced or other forms of involuntary labour. We will comply with the UK Modern Slavery Act 2015 by setting out steps we have taken to ensure that slavery and human trafficking are not taking place in any part of our supply chains or businesses.

We respect the rights to water and sanitation for people who could potentially be affected by our activities, including our employees, partners and neighboring communities.

The Board of Directors is responsible for the control of adherence to this Policy.

## PROHIBITED CONDUCT

Ferrexpo upholds and supports the right to equal treatment without discrimination or harassment<sup>1</sup>. Any violation of human rights, including discrimination and harassment, are prohibited.

Anyone at Ferrexpo found to have engaged in conduct constituting discrimination and/or harassment may be subject to disciplinary action, up to and including termination.

## REPORTING VIOLATION OF HUMAN RIGHTS

Ferrexpo encourages the reporting of all incidents of human rights violation, including harassment and discrimination, regardless of who the alleged offender(s) might be.

No one is to be penalized or disciplined for reporting an incident or for participating in an investigation.

Partners or employees can report incidents or complaints verbally or in writing via Integrity Line <http://ferrexpo.com/IntegrityLine>.

Your privacy will be maintained confidential in accordance with applicable data protection laws.

## INVESTIGATING COMPLAINTS

Ferrexpo ensures that complaints or incidents will be investigated in a fair, respectful and timely manner, in a reasonable time, generally within 30 days, unless there are extenuating circumstances (i.e. illness, complex investigation).

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<sup>1</sup> A few common examples of harassment may include, but are not limited to:

- Making remarks, jokes or innuendos related to a person's race, disability, creed, age, or any other ground;
- Posting or circulating offensive pictures, graffiti or materials, whether in print or via e-mail or other electronic means;
- Singling out a person for humiliating or demeaning "teasing" or jokes because they are a member of a group protected under the Human Rights Code;
- Ridiculing a person because of characteristics that are related to a ground of discrimination. For example, this could include comments about a person's dress, speech or other practices that may be related to their race, disability, or creed.

After an investigation is completed, the parties to a complaint may be informed in writing of the results of the investigation and any corrective action taken or will be taken by Ferrexpo.

All records of the investigation will be kept confidential. The investigation documents, including report should not be disclosed unless necessary to investigate an incident or complaint of workplace harassment, take corrective action or otherwise as required by law.

Records will be kept for a minimum of one year after the conclusion of the investigation. Information about complaints and incidents shall remain confidential. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect employees, to investigate the complaint or incident or to take corrective action or otherwise as required by law.

## **TRAINING**

Trainings on human rights are included into the annual general course on compliance issues which is conducted on-line.

## **DISCLOSURE**

To provide transparency all employees, business partners, contractors, agents, vendors and stakeholder the Policy shall be published on the Ferrexpo Plc website.