



HUMAN RIGHTS POLICY

2MB TECH

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Human Rights Policy

1. INTRODUCTION

1.1 2MB TECH (“**2MB**”) is committed to contributing to and respecting internationally recognized human rights. Preventing violations of human rights forms an integral part of 2MB’s values.

2MB shall include and mean all the direct and indirect subsidiaries, associate companies, group companies and partnerships.

1.2 Human rights are universal. Inherent dignity and equality for all is the foundation of freedom, justice and peace all around the world. 2MB subscribes to the principle that every human being has the right to be treated with dignity, fairness and respect. 2MB upholds the dignity, fundamental freedoms and human rights of its employees, contractors and the communities in which they live and work. 2MB respects human rights and cares about its role as a good corporate citizen for the human rights of each individual. 2MB as business enterprises will comply with all applicable laws with full respect to human rights.

1.3 2MB Human Rights Policy (“**Policy**”) are based on the following international conventions and declarations:

- The Universal Declaration of Human Rights;
- The United Nations (“UN”) Guiding Principles on Business and Human Rights;
- The International Labor Organization (“ILO”) Declaration on Fundamental Principles and Rights at Work;
- The OECD Guidelines for Multinational Enterprises; and
- The ten principles of the UN Global Compact.

2. APPLICABILITY & SCOPE

The Policy shall be applicable to all companies forming part of 2MB and emphasizes the fundamental principles shaping the corporate responsibility of 2MB with regard to its employees and contractors and provides a basis for its business relations and working environment within the group. 2MB companies and employees are expected to comply with any specific local legislation in relation to human rights that may be applicable to them and will reflect these Policy in their day-to-day operations. The Policy is approved at board level of 2MB and shall be implemented in letter and spirit by the management of the 2MB companies.

3. COMMITTING TO THE HUMAN RIGHTS POLICY

2MB respects the human rights of its employees and is committed to take appropriate measures to prevent, mitigate and where required redress human rights violations. The aim of 2MB is to provide good working conditions by ensuring application of its Codes of Conduct. The below headlines emphasize the significant matters adopted by 2MB to ensure human rights and provide favorable work conditions.

3.1 No Child Labour

The dignity of a child must be protected and any kind of child labour is prohibited. 2MB abides by minimum employment ages of young workers in accordance with the ILO's labour standards and does not tolerate child labour in any form.

3.2 No Forced Labour and Human Trafficking

2MB does not tolerate any forms of forced, bonded or compulsory labour, unlawful labour of any kind and all forms of modern slavery, including human trafficking, in accordance with labour standards of the International Labour Organization. Employment with 2MB is based on voluntary participation, and, unless voluntarily agreed to otherwise in writing between 2MB and an individual employee, the employees are free to terminate their employment contracts at any time within the period of notice set out under the applicable legislations and/or their employment contract.

3.3 Freedom of Expression and Association

2MB recognizes and always aims to maintain collaborative and constructive approach with partners to address and protect the interests of the employees in accordance with the UNGC Principle 3 and were permitted by applicable local law.

3.4 No Discrimination or Harassment

2MB does not tolerate any kind of harassment, discrimination or unwarranted disadvantage. Employees of 2MB must not be disadvantaged, harassed or favoured on the grounds of their skin colour, nationality, language, ethnic or social origin, age, gender, religion, political or other beliefs, disability, or sexual orientation. Any form of harassment or discrimination which occurs during, in respect of, or as a result of the work being carried out is not tolerated by 2MB. Equal treatment of all employees is one of 2MB's fundamental principles. 2MB allows employees to communicate openly with management regarding management practices without fear of retaliation, intimidation or harassment.

3.5 **Equal Opportunity and Ethical Employer**

2MB is committed to a policy of equal employment opportunity and prohibits discrimination or harassment against an employee or applicant on the basis of gender, race, color, religion, sexual orientation, age, disability, national origin, or any other protected status by applicable laws and regulations.

2MB is committed to hiring the workforce lawfully, in line with the national and labor standards of the ILO, and in a fair and transparent manner that respects human rights.

2MB is equally committed to refraining from misinforming potential employees about the nature of the work, charging recruitment fees.

Potential employees must receive a written notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities.

3.6 **Health and Safety**

2MB complies with all applicable employment, occupational health and safety legislation, and industrial standards regarding its employees around the world. Protection and support of the employees' occupational health and safety is a fundamental priority for 2MB. In terms of security, attention is paid to keep all employees and visitors safe at all of 2MB sites, and the appropriate measures are taken in accordance with applicable law.

3.7 **Employment condition**

- **Working Conditions**

2MB supports a healthy workplace environment considering a balance between the employees' professional and personal lives. 2MB values leisure, resting times, holidays and healthy life balance for all of its employees. Appropriate measures are developed to meet local and national conditions, including child care arrangements. 2MB respects all applicable legislation in relation to working hours, minimum wages, overtime compensation, and legally mandated benefits. 2MB allows employees to communicate openly with management regarding working conditions without fear of retaliation, intimidation or harassment.

- **Working Hours**

Working hours shall comply with the applicable local laws.

- **Wages & benefits or Equal Remuneration**

Compensation paid to employees shall comply with all applicable wage laws, including those related to minimum wages, overtime hours and legally

mandated benefits. Any fringe benefits and bonuses are subject to local laws and regulations and related 2MB company practices.

- **Internal instructions and guidelines**

All internal (both group-wide and company-specific) rules, policies and guidelines related to the working conditions shall be in compliance with local laws and regulations. In line with the Code of Conduct, all employees are expecting to follow all such rules, policies and guidelines adopted by relevant 2MB company.

3.8 **Equal Training and Education Opportunities**

2MB supports and delivers training and education programs to its employees in order to promote long-term employability on a high level. Focusing on the personal development of employees based on equal opportunities is also one of 2MB's essential principles.

3.9 **Protection of Personal Data**

2MB maintains high data protection standards in accordance with the applicable legislation and international principles, in order to ensure that personal rights are protected in the best manner all around the world. It is ensured that any use of personal data complies with applicable legislation, and that the rights of the individuals are at all times respected.

3.10 **Environment**

2MB endeavors to preserve the environment by preventing and minimizing its impact and Carbon footprint by increasing energy efficiency and use of renewable energy in accordance with the United Nations Framework Convention on Climate Change. To promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies, 2MB supports the use of recycled and renewable materials and endeavors to utilize renewable energy in its manufacturing operations by considering the environmental performance.

3.11 **Deploy Security Forces**

2MB strives to maintain a workplace free of violence, harassment, intimidation, and other unsafe or disruptive conditions. 2MB provides employees with security safeguards, as needed, and respects their privacy. If public or private security staff is working for 2MB, it ensures that they are trained and committed to human rights of all people working on site and local communities.

3.12 Local Communities

In all the business activities, 2MB cares not just for its own people but also the local communities who might be affected by its operations. 2MB is committed to the rights of the people who are living close to the sites, especially of minorities and indigenous peoples. Land, forest and water rights as well as low noise and air emissions norms are respected and forced eviction needs to be avoided.

4. IMPLEMENTING THE HUMAN RIGHTS POLICY

2MB recognizes the requirements of the international principles referred in Section 1.3 of this Policy based on a human rights due diligence process incorporated in its risk management system and will monitor effectiveness through such process.

2MB's commitment entails respecting human rights and seeking to avoid involvement in human rights abuses by identifying, assessing and minimizing potential adverse impacts through due diligence and resolving grievances from affected stakeholders effectively.

4.1 2MB companies will align their policies with these Policy.

2MB expects its contractors, suppliers and other organizations with whom 2MB works to introduce comparable principles in their companies, to incorporate them into their company policies and to encourage and support the development of equivalent management systems to comply with Human Rights principles.

4.2 These Principles will be reviewed periodically and updated to reflect the evolution of the human rights risk that may occur regarding the operations of 2MB group companies.

5. HUMAN RIGHTS MITIGATION & REMEDIATION

Through company-based grievance mechanisms, 2MB strives to provide effective remedy where human rights are violated. 2MB encourages its employees to freely speak up about any concerns they may have about their rights, including labor rights, without fear of retaliation, including through grievance channels. 2MB is committed to identifying and responding to concerns as quickly as possible.

Reporting on human rights commitments, efforts, and statements is part of the Management Discussion and Analysis (MDA) and Business Responsibility and Sustainability Reporting (BRSR) section and is included in 2MB annual report.