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	Glaston Corporation Board of Directors		



# POLICY FOR HUMAN RIGHTS

PUBLIC

# 1. General

## 1.1. Purpose

This policy outlines Glaston's commitment to respecting human rights. The purpose of this document is to describe Glaston's operational environment, key risks and impacts relating to human rights and measures taken to address, prevent and mitigate those risks and adverse impacts.

## 1.2. Scope

This policy applies to all Glaston businesses, companies, directors, officers and employees worldwide and its enforcement is subject to mandatory local legislation. As a global policy, it applies to all locations and situations where Glaston's business is conducted.

Glaston encourages its business partners to continually improve and develop their practices to reach the human rights standards and expectations set out in this Policy.

# 2. Our commitment to human rights

Human rights belong to everyone. Glaston is committed to respecting all human rights recognised in the UN's Universal Declaration of Human Rights and existing human rights conventions. Glaston is committed to act according to United Nations Guiding Principles on Business and Human Rights (UNGP) and OECD Guidelines for Multinational Enterprises. Glaston respects labour rights and is committed to the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

We continuously improve our understanding of our human rights impacts and take necessary actions to remediate the impacts we become aware of.

# 3. Rights-holders

Glaston is committed to respecting the human rights of all individuals and groups our operations have an impact on, i.e. the rights-holders. We respect the rights of our own employees, job applicants, subcontractors, suppliers, customers, workers throughout our value chain, and all communities affected by our operations.

We understand that working together with our partners is crucial in order to cooperate sustainably and in accordance with our human rights commitments. We use our influence in mitigating possible adverse human rights impacts taking place in our supply chains.

# 4. Human rights in Glaston's operations

Glaston's operations has direct and indirect impacts on the human rights of its various stakeholders. While we respect all human rights, in this policy we describe more specifically those human rights found most relevant to our operations. These topics and Glaston's approach to human rights due diligence relating to them are described as follows.

#### 4.1. Human rights due diligence

We identify, assess, and prioritize human rights impacts throughout our business and aim to prevent and mitigate those impacts in an ongoing manner. Our human rights due diligence process includes for example the following aspects.

We continuously assess the human rights related risks and impacts via various specific risks assessments. For example, we have a process to evaluate and mitigate risks related to

occupational safety, supplier performance and employee engagement. We continuously develop these processes to also address the human rights impacts.

We expect our strategic suppliers and subcontractors to meet the standards of responsible business conduct outlined in our Supplier Code of Conduct. Our aim is to include the consideration of human rights impacts in our supplier selection, evaluation, and audit processes. We are continuously promoting and enhancing healthy and safe working environment throughout our operations. Our HR policies and procedures are constantly developed to ensure Glaston is an equal and fair workplace.

Glaston engages its stakeholders through continuous dialogue, for example via supplier site visits, employee surveys, customer satisfaction surveys and interviews, investor dialogue and safety surveys. Glaston regularly performs a double materiality assessment in order to define the most important sustainability related positive and negative impacts as well as risks and opportunities considering also human rights aspects.

## 4.2. Right to health and safety

Safe and healthy working conditions are a prerequisite for all our operations and for the well-being of our employees and anyone working or visiting Glaston sites. We work in the glass machinery industry, which requires risk management measures in order to ensure the health and safety of everyone working at Glaston sites. We also have employees and subcontractors working at customer sites around the globe sometimes in circumstances that require special attention for health and safety. We are committed to ensure safe and healthy working conditions for everyone working at and for Glaston. We also recognise our responsibility to ensure that use of our products is safe for our customers.

Health and safety training is provided to ensure everyone can perform their work in a safe manner. Everyone at Glaston has the right to stop working if they find that their personal safety or the safety of others is compromised. We recognise the inherent possibility for human errors. When incidents and near-miss situations occur, we search for root causes instead of blaming individuals. However, deliberate violations of the Glaston safety instructions are not tolerated. We also provide an online incident and accident reporting tool.

We support our customers to make sure our products can be used in a safe manner. We do this by providing training, manuals and customer service.

Glaston's most salient safety and health related impacts concern our own workforce, subcontractors, and our customers. We are also committed to use our influence in ensuring that rights to health and safety are realised for everyone working in our value chain.

## 4.3. Rights to just working conditions, hours and living wages

Glaston has operations around the world, but most of our suppliers and subcontractors are located in Europe and China. One significant aspect from the human rights perspective is how the rights of workers throughout our value chain are realised. When Glaston operates in countries and regions where the risk of human rights violations is considerably high, we are committed to develop our processes to ensure the rights concerning fair employment are respected in our value chain.

Everyone has the right to fair employment, just working conditions, decent working hours and a living wage. Glaston aims to provide all its employees with a compensation that is competitive in the relevant markets and industries. We expect our sub-contractors and suppliers to comply with applicable laws regarding e.g. working hours and minimum wages.

We respect our employees' right to freely associate and bargain collectively, though we recognise that freedom of association and collective bargaining is not always fully respected in the countries where we operate.

We recognise that we may operate in countries where child labour and forced labour exist. Glaston prohibits any form of modern slavery in its operations and supply chains. This includes the use of threats, violence, deception, or coercion to force employees to work against their will. We expect our suppliers to meet the same standards by signing our Supplier Code of Conduct.

## 4.4. Right to equal and non-discriminatory treatment

Glaston values equity, diversity, and inclusion. We are committed to promote equity and nondiscrimination in all our operations, especially relating to our own workforce. At Glaston, we do not accept discrimination, harassment, or any other form of inappropriate behaviour. Everyone is treated equally regardless of their background or personal characteristics. Our Code of Conduct outlines the principles we expect everyone working for and at Glaston to comply with in order to ensure equal and non-discriminatory treatment for all.

Our measures to promote equity and non-discrimination include engaging employees in diversity, equity and inclusion work through employee surveys and providing Code of Conduct training for all Glaston employees. We also monitor the gender pay gap in Finland and plan to expand the scope to other countries as well.

#### 4.5. Children's rights

We hold children's and young persons' rights very dear to us. Glaston is a part of Ahlström Collective Impact cooperation with UNICEF Finland, which supports UNICEF's work in children's education around the world.

We respect the rights of a child in all our operations. We support the youth by providing learning opportunities in Glaston operations. For example, in Germany, we have an apprentice group starting to work with us in vocational training program every year. At Glaston, young employees do not perform hazardous work or night work, and Glaston has a strict age limit of 15 years for all employees. We do not approve of child labour in our own operations or any parts of our value chain.

#### 4.6. Remedy and grievance mechanism

We are committed to taking appropriate action to remediate situations where our activities have caused or contributed to any adverse human rights impacts. We encourage our employees, suppliers, and business partners to speak up on any concerns relating to potential violations of this Human Rights policy, the Glaston Code of Conduct, the Supplier Code of Conduct or the law. We provide alternative channels for reporting concerns, including direct contact with Glaston Legal & Compliance and a whistleblowing channel.

We acknowledge our responsibility to ensure that our speak up process is fair, accessible, and transparent. Our whistleblowing channel is available for employees, suppliers, distributors and the public at all times. It is operated by an independent third party and is accessible anonymously. The channel is available via webform in several languages.

Glaston's Code of Conduct is communicated to all employees and it includes an overview on the reporting process. More detailed instructions are established internally in Glaston's Whistleblowing guideline available on Glaston's Global Intranet. All reports issued via the whistleblowing process are treated confidentially and an independent investigation is conducted for cases that require further review. Glaston attempts to find a solution and a remedy most suited for each case subject

to investigation. Glaston has a strict policy for prohibiting retaliation against individuals who report a concern in good faith.

# 5. Further information and Review

Group Legal will give further information and advice on this Policy.

This policy will be periodically reviewed by Group Legal to ensure alignment with the latest best practices, regulations, and global standards. Any material changes in this policy will be approved by the Glaston Board of Directors. Minor changes can be approved by the CEO.