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MANE GROUP

HUMAN RIGHTS POLICY



PO-RSE-012/01
August 2024

Our commitments

At MANE, we believe that being a responsible company starts with behaving in an ethical manner. Maintaining the highest ethical standards is part of the MANE Way, the foundation for everything we create, build, and do. Our commitment to Human Rights is an integral part of it, guiding our actions and shaping our interactions with our stakeholders. We also believe in the value of each of our members and their right to be treated with respect and dignity. As a signatory of the United Nations Global Compact (UNGC) since 2003, respect for Human Rights has always been one of our founding and strongest commitments.

Through this Human Rights Policy, we reaffirm our full commitment to respecting all internationally recognized Human Rights standards within our operations, as well as along our value chain.

Our policy is based on the rights and principles set out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), and the labor standards outlined in the conventions and recommendations of the International Labor Organization (ILO). In addition, the policy is also developed under the guidelines of the United Nations Guiding Principles for Business and Human Rights and its reporting framework, the OECD Guidelines for Multinational Enterprises, as well as on ETI's internationally recognized Base Code of Labor standards.

This policy is also aligned with our core principles and ethical values and complements our existing policies, especially the MANE Group Code of Ethics, our Responsible Purchasing Policy and the Diversity Charter.

The principles described in this document do not replace the laws and regulations in effect in the different countries where the Group does business. When faced with conflicting requirements of international and national standards, we will adhere to national law, while working to meet the international standards to the greatest extent.

Scope of this policy

Our operations

The policy is applicable to all employees of the MANE Group and its affiliates, and to any third party working on behalf of the Group. It complements our Code of Ethics, a binding and non-negotiable guideline for our employees.

Our value chain and business partners

We also expect all our direct⁽¹⁾ and indirect suppliers⁽²⁾, to commit to respecting the same rights, as outlined in our Group Responsible Purchasing Policy, to formulate their own policies aligned with our principles and implement them in their respective businesses. Though our risk-based due diligence process, we have different requirement levels to ensure full compliance with this policy and regulations, ranging from questionnaires to third-party audits of supplier's facilities and agricultural production.

(1) *Direct supplier: Any individual/ organization that supplies raw materials and packagings directly integrated into MANE's manufacturing processes.*

(2) *Indirect supplier: Any individual/ organization providing goods or services not directly incorporated into MANE's manufacturing process but crucial for operational efficiency and support functions, such as logistics, maintenance, IT and administrative services.*



Policy statements and Salient Human Rights issues

While we are committed to respecting all internationally recognized Human Rights standard, our approach places specific effort on salient Human Rights issues, i.e. the Human Rights that are at greater risk of the most severe negative impacts through our activities or business relationships. These salient Human Rights issues are identified primarily on 'their risk to people' and only secondarily to the business.

The following policy statements define our most salient human right issues and our mitigating strategies.

Living wages and Working Hours

We are committed to paying our employees according to globally accepted, standardized living wages. We ensure our employees are compensated at a level that allows workers and their families to meet their basic needs (access to food, water, housing, education, culture, healthcare, etc.). Internal and external audit measures are set into place to assess compliance according to national legal minimum wage, regional living wages and industry benchmarks.

The Group adheres to national and international legal standards regarding working hours, limiting regular working week to 48 hours and ensuring that the total of regular and overtime hours in a week does not exceed 60 hours under typical circumstances, as clearly detailed in employees' contracts. Any contractual overtime must be explicitly agreed upon by workers in their employment contracts, and all overtime work must be voluntary and compensated at a fair rate compliant with law.

Child labour

Acknowledging the importance of safeguarding children's rights and to protect their future wellbeing, we maintain a clear stance against child labor. Child labor refers to work carried out by a child less than 15 years of age, except when local laws stipulate a higher minimum age for work or compulsory education, in which case it is the higher age that prevails. MANE prohibits any recruitment of minors in labor activities that may compromise their rights, education and well-being. In the event of child labor in business activities brought to MANE's attention, the Group is committed to work with the stakeholders involved and ensure that appropriate remedial measures are taken.

The Group voluntarily refrains from hiring young persons under 18 years of age for working at night or in hazardous conditions.

Forced labour, Modern slavery and Human trafficking

The Group prohibits all forms of forced labor or modern slavery within its operations and supply chain. We are committed to maintaining a work environment that ensures dignity, freedom and well-being of our employees.

We strongly condemn practices that include coercion, debt bondage, human trafficking, physical restraints or any other modes of exploitation. Our ongoing efforts include regular audits, supplier engagement and an effective due diligence in practice to identify and mitigate unethical labor practices.

Freedom of assembly and Collective bargaining

The Group values the rights of all employees to form and organize unions, belong to the union of their choice as well as engage in collective bargaining on their behalf.

We foster a supportive environment where the representatives can communicate with members in their workplace without any hindrance. Our commitment also extends to ensuring that all employee representatives and staff members forming worker unions will not be subjected to discrimination, harassment, intimidation, or retaliation due to union membership or participation in union activities.

Wherever the right to freedom of association and collective bargaining is restricted under law, we should facilitate and not obstruct the development of a parallel means for independent and free association and bargaining.

No harassment and No discrimination

The MANE Group is committed to fostering a workplace culture that promotes diversity, equity, and inclusion, while preventing discrimination and harassment. As a signatory of the French Diversity Charter, we recognize the value of diversity in the company. We do not tolerate any discrimination based on but not limited to race, caste, national origin, colour, religion, gender identity, age, sexual orientation, physical appearance, pregnancy, marital status, disability, union membership or political affiliation.

Occupational Health and Safety

At MANE, we are committed to providing a workplace culture that fosters a healthy environment where our workers are protected and provided with the best resources.

Within the framework of our work-related health and safety policy, the MANE Group undertakes to provide a safe, healthy, secure and hygienic workplace where our workers and external company personnel working on any of its sites are protected.

We provide all necessary resources and take adequate steps to prevent accidents and injury occurring during, as a result of, or in relation to work, by minimizing the causes of danger inherent in the working environment. Our facilities are designed to adhere to the highest safety standards and appropriate Personal Protective Equipment's (PPE) are provided to the employees to prevent any potential hazards.

The Group expects employees to strictly respect the rules and standards regarding occupational safety and hygiene. Regular and recorded health and safety trainings are given to employees, repeated for new or reassigned workers before initiating their work.

We also recognize the importance of mental health and well-being of our employees. We are committed to building an inclusive and positive work environment that promotes the mental well-being of the workforce.

Local and Indigenous Communities' rights, Property and Land rights

As a globally recognized entity, we acknowledge and understand the culture, rights, and importance of the communities along our value chain. We respect the rights of any individual or group, including local or indigenous communities in terms of their land, territories, and resources. For any decisions regarding their property or land, we strictly adhere to principles of Free, Prior and Informed Consent (FPIC). Our natural raw materials sourcing activities are compliant with the principles of the Nagoya Protocol of the United Nations Convention on Biological Diversity. The MANE Group is also committed to having transparency in its operations and is always open to dialogue with the communities where it operates in.



Policy implementation

Due Diligence

While having strong commitments to respect Human Rights, we also recognize the need to have a systematic and practical due diligence approach to identify, prevent, mitigate, and address any potential or actual adverse human impacts in our value chain. Our due diligence approach is developed according to the UN Guiding Principles on Business and Human Rights (UNGPs) guidelines:

- Perform regular Human Rights risk assessments in the company, within supply chain and all relevant stakeholders;
- Adopt the necessary measures and actions in both internal and external controls;
- Track and monitor the effectiveness of the policies implemented through regular reviews of our due diligence process;
- Communicate and report effectively with stakeholders.

Monitoring, Reporting and Stakeholder Management

We continuously evaluate and review how best to strengthen our approach to addressing Human Rights. We realize that we are on a continuous improvement pathway. We understand the importance of working with relevant stakeholders along this journey. In our efforts to contribute to building industry standards, we have been constantly involved with various organizations and groups, including representatives from labour and nonprofit organizations, customers, suppliers and governmental bodies to understand the best practices and their expectations on our policies.

Training

To put these principles into action, the Group continuously implement effective and mandatory trainings to targeted audiences on relevant themes to their scope of activities. Through our Group Responsible Purchasing Policy, we ensure that our suppliers adhere to the same principles. We also strive to raise their awareness and can offer them trainings and support (from expert third parties) so that they integrate Human Rights into their own activities.

Grievance mechanism and Remedy

Access to effective grievance mechanisms, including our company-based grievance mechanisms, are of critical importance to enable effective remedy wherever we are directly linked to or have indirectly contributed to Human Rights adverse impacts. That is why we maintain efficient and easily accessible grievance mechanisms, through which our employees, customers, business partners and third parties can report irregular behaviour or raise their concerns.

Our employees can raise their concerns of any potential ethical or Human Rights violations to their direct supervisor, employee representative bodies, the human resources department or through our internal ethics reporting system: ethics@mane.com.

Third parties can confidentially report issues to the Ethics Committee by email to ethics@mane.com or to our local ethical reporting lines, when local regulations require so.

Any ethical violations reported will be treated with strict confidentiality by the Ethics Committee. The MANE Group will ensure that any individuals who raise concerns in good faith will not be subjected to discrimination or retaliation.

Policy management and Responsibility

Integrating Human Rights considerations in our business is a key priority, as reflected in our latest double materiality assessment. The President and the Group Executive Board are responsible for MANE's strategy, organization and oversight including on matters related to Human Rights. Management of Human Rights is the responsibility of the Group CSR Committee, which includes the Group Executive Board, in collaboration with Country Management.

Through regular management reviews, the Group CSR Director reports to the Group CSR Committee on the company's Human Rights implementation status, across our business categories, supply chain and geographies.

To ensure its continued relevance and effectiveness, management will vigilantly monitor both internal and external factors and make necessary adjustments to this Policy, at any time and without prior notice.

Le Bar-sur-Loup, August 2024

Jean M. Mane
President

