

Human Rights Policy at L.C.I. S.à r.l.

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This document has been reviewed by:

Version	Reviewer	Date reviewed	Comment
001	Stefano Florio	19/10/2022	
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001	Franco Florio	11/11/2021	
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I. Introduction and Scope

L.C.I. S.à r.l. (hereafter "L.C.I."), commits to respect Human Rights as defined by the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labor Organization's (ILO) eight Fundamental Conventions. The International Bill of Human Rights collectively includes the two Covenants: the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social, and Cultural Rights.

Where national laws and these international Human Rights standards differ, the higher standard must be followed, and where they are in conflict, L.C.I. will seek to respect internationally recognized human rights to the greatest extent possible.

This policy aims to set human right expectations on a wider level, meaning including our chain of custody through our "Supplier code of Conduct", communities, potentially affected groups, and other relevant stakeholders.

II. Commitment

a. Human Rights

L.C.I. supports and respect the protection of internationally proclaimed human rights and strives not to be complicit in human rights abuses.

b. Underage labour

L.C.I. demonstrates that no underaged labour has been used in the production and distribution to any products or services, given the laws of the country on minimum employment aged. Workers above the legal working age and below age 18 should benefice from adequate protections.

c. Forced labour

L.C.I. prohibits forced or compulsory labour in all its forms and does not take part in any activities linked to human trafficking.

d. Freedom of association and Collective bargaining

L.C.I. shall recognize the freely exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

e. Discrimination and Diversity

L.C.I. shall ensure equality of opportunity, occupation, and treatment in respect of employment and occupation without discrimination on grounds of race, ethnicity, age, gender, sexual orientation, colour, religion, political opinion, national extraction, or social origin.

L.C.I. shall take all appropriate measures to ensure that the workplace is free of any harassment, or abuse. Any form of those must be eliminated and not tolerated.

f. Wages and benefits

Wages and benefits must meet legal minimums and industry standards without unauthorised deductions, including employer contribution for social benefits and services. L.C.I. shall aspire for the provision of a living wage that covers the necessities for life as defined in its local context. Also, L.C.I. shall guarantee equal opportunity and treatment, such as remuneration for men and women for work of equal value.

g. Working hours

L.C.I. must ensure working hours comply with national laws and standards and should prevent excessive working hours (including overtime) by respecting relevant working time legislation or other national legal limits.

h. Workplace health and security

L.C.I. shall ensure, so far as is reasonably practicable, that: (a) the workplaces, machinery, equipment and processes under their control are safe and without risk to health; (b) the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; (c) where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health; (d) measures are taken to prepare and respond to any emergency situations; (e) access to water, sanitation and hygiene; (f) appropriate building construction electrical, and fire safety.

i. Grievance mechanism

L.C.I. provides a grievance mechanism for employees and their organisations to enable employees to anonymously raise workplace concerns. The mechanism must be transparent, set out clearly how grievances will be assessed, and feedback provided. Employees and their representatives must be informed clearly on how the scheme operates, its scope and that it is equally accessible to all employees.

j. Right to Strike

Employees are allowed to strike to assert collectively their rights in the workplace, without fear of intimidation or retaliation.

k. Anti-corruption

L.C.I. shall work against corruption in all its forms, including bribery, to work in fair and ethical business practices.

l. Unauthorized subcontracting

L.C.I. and its suppliers collaborate to address unauthorized subcontracting. In case of such practice are discovered, we may terminate our relationship with the supplier if appropriate remedial action is not taken.

III. Compliance

- L.C.I. is expected to follow these guiding principles and all local and state laws covering Human Rights. L.C.I. will regularly review and update the progress on efforts, and publicly communicate the results.
- If any employee believes that someone is violating the Human Rights Policy or the law, they are asked to report it to their Human Resources using the Grievance Form at L.C.I. S.à r.l.
- A copy of this policy will be provided internally and externally. It will be communicated to our employees, stakeholders, contractors, and suppliers.

Signature of Executive Directors:

Date: 11 NOV. 2022

