



Human Rights Policy

Policy owner: Group Compliance

I. OUR COMMITMENT

Our Code of Conduct clearly states that Lotus Bakeries aims to create a workplace where people are treated fairly and provided with a healthy and safe working environment, enabling each and every individual to reach their full potential. Respect for human rights is an indispensable part thereof.

At Lotus Bakeries, we are committed to upholding human rights principles throughout our operations worldwide. We recognize that human rights are fundamental to our success as a responsible and sustainable business. We believe that every individual deserves respect, dignity, and equal treatment.

II. SCOPE

The human rights policy of Lotus Bakeries applies to all our operations and to all full-time, part-time, and temporary colleagues who are directly employed by Lotus, including our directors and officers. The policy also extends to any subsidiaries or joint ventures where Lotus has a majority interest or management control.

It is important to note that our responsible sourcing policies and procedures specifically address our expectations for our suppliers, vendors, agents, and contractors. In terms of human rights, Lotus Bakeries imposes its Supplier Code of Conduct on its suppliers of packaging, raw materials, equipment, and finished products. We believe that it is not only our responsibility to ensure that our own operations uphold human rights, but also that of those in our supply chain.

III. OUR PRINCIPLES

Our guiding principle is to abide by the international recognized human rights standards, contained in the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business & Human Rights, the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. Where local law and international standards exist, Lotus Bakeries will follow the higher standard. In case of conflicting local provisions, we will seek to always respect the highest international human rights standard.

Our policy is guided by the following principles:

- **Child Labor and Young People:** Lotus Bakeries does not tolerate any form of child labour or exploitation of young people. Reference is made to the International Labor Organization Convention 182, which refers to all work that is mentally, physically, socially, or morally dangerous and harmful for children and/or interferes with their schooling. Lotus Bakeries does not employ children or young people under the minimum age for employment as set in Convention 138 of the International Labor Organization or, if higher, the age specified by local legislation.
- **Forced Labor and Freedom of Movement:** Lotus Bakeries is committed to ensuring that all its employees have the freedom to choose their employment and working conditions. We do not tolerate any form of forced labour, including bonded or indentured labour, human trafficking, or any other form of coercion. We support the right of our employees to freedom of movement, and we do not restrict their ability to leave our employment or workplace. This also includes that our employees are not obliged to work overtime.

- **Freedom of Association:** Lotus Bakeries respect its employees' right to form and join trade unions and other worker organizations. In countries where there is no legal basis for trade unions or other worker organizations, we maintain open and constructive communication with our employees to ensure that the rights of our employees are protected and to establish effective representation of their interests.
- **Adequate Standard of Living:** We provide fair and competitive compensation for our employees and ensure that they receive benefits that enable them to maintain an adequate standard of living. We also provide a safe and healthy working environment that is conducive to their overall well-being.
- **Discrimination and Harassment:** Lotus Bakeries is committed to providing a workplace free from discrimination and harassment. We will not tolerate any form of discrimination or harassment based on race, gender, sexual orientation, age, religion, national origin, political opinion, disability, or any other protected class.
- **Workplace Health and Safety:** Lotus Bakeries is committed to providing a safe and healthy workplace for all employees. We comply with all applicable health and safety laws and regulations and take all necessary steps to prevent accidents and injuries. We will also provide training and education to all employees to ensure that they are aware of workplace health and safety hazards and how to prevent them.
- **People in communities impacted by our operations:** Lotus Bakeries respects the rights of all people in communities which are, or may be, impacted by our operations. This includes the respect of the land rights of communities and indigenous people. We conduct due diligence around land rights and title at the start of each new venture. We also strive not to negatively impact people's access to water and other natural resources.

IV. GOVERNANCE

Lotus Bakeries will regularly review and update this policy to ensure that we are in compliance with all applicable laws and regulations, and to reflect best practices in human rights principles.

Lotus Bakeries Executive Committee (Exco) is responsible for overseeing Lotus Bakeries human rights policy and programs, thereby assisted by several departments, such as Group Compliance, ESG, HR and Procurement. Regular reporting is done to the Board of Directors.

Lotus Bakeries moreover reports on its compliance with and progress on human right topics in its Annual Report, which is publicly available.

V. IMPLEMENTATION

It is the responsibility of the Human Resources department in each of the countries in which Lotus Bakeries operates to ensure that this Policy is rolled out in each legal entity and fully enforced.

VI. REPORTING MISCONDUCT

If despite our commitments to ethical behaviour, any conduct is identified that seems to violate this policy or applicable laws and regulations, this can and should always be reported.

By speaking up, you give Lotus Bakeries the opportunity to review and act on the issue. We believe that speaking up is key to sustaining our reputation, success and license to operate. We greatly value the help of employees and others who identify and speak up about potential concerns that need to be addressed. People who speak up are protected and will not suffer any negative consequences for raising concerns in good faith about suspected misconduct. Lotus Bakeries will not tolerate any form of retaliation against you for speaking up.

You may use a variety of confidential reporting channels set out in our [Whistleblowing Policy](#). One of the channels is our web-based reporting system (organized via the independent provider Convercent) which allows you to raise concerns anonymously and in your own language, for which you find the link below.

[Lotus Bakeries Whistleblowing line](#)

For more information or questions on this policy, please contact Group Compliance (directly or via e-mail group.compliance@lotusbakeries.com).