



## HUMAN RIGHTS POLICY

**VAN-ESG-2010**

Rev. 01

10/08/2023

# HUMAN RIGHTS POLICY



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|  | <h1 style="text-align: center;">HUMAN RIGHTS POLICY</h1> | <p style="text-align: center;"><b>VAN-ESG-2010</b><br/>Rev. 01<br/>10/08/2023</p> |
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## 1. OBJECTIVE

The present Human Rights Policy aims to establish guidelines and responsibilities for a development and growth with values and purposes of sustainable, responsible, humane, and ethical work at Vancouros.

## 2. SCOPE

This Policy is applicable to all Vancouros employees, as well as to other stakeholders with whom it relates and interacts, such as service providers, clients, suppliers, staff, directors, partners, regulatory bodies, government, society, among others.

## 3. DEFINITIONS

**ILO** – International Labour Organization.

**UNO** – United Nations Organization.

**CLT** – Consolidation Labour Laws.

**Modern slavery** - Any practice of restriction and coercion, even if not criminalized by law, that presents a degrading work situation and violates the human rights of a dignified social existence and/or exploitation from which one cannot easily free themselves.

**Human rights** - These are all the rights inherent to every human being, regardless of any individual condition, such as their color, race, sex, nationality, ethnicity, language, religion, among others (UNO).

**Equity of access** - ensures that everyone has the same right, taking into account diversity.

**Harassment** - Unwanted action or persistent and inconvenient pursuit targeting a specific person or group, disturbing their peace and freedom.

**Abuse** - Improper, wrongful, unfair use of any circumstance to subject a person to embarrassment or humiliation.

**Freedom of association** - It is a universally recognized fundamental and individual right of all workers to freely and without interference associate with a union.

**Collective Negotiations** - It is a labor right guaranteed by the Consolidation Labour Laws (CLT), which ensures the opportunity for negotiation between the employer and employee, with the objective to establish working conditions and payment terms.

**Non-discrimination** - is treatment based on the premise of equality for all individuals regardless of their particular characteristics, such as origin, age, religion, and other aspects relevant to each individual's uniqueness.



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### 4. GUIDELINES

This Human Rights Policy establishes the following guidelines for its effective implementation.

#### 4.1. Fundamental principles

- a) Respect human rights by seeking to prevent and mitigate negative impacts throughout our value chain, combating discrimination in all its forms, and promoting actions based on principles of citizenship, social inclusion, and non-discrimination;
- b) Foster an organizational culture that values employees, offering good working conditions and a positive work environment, professional development, encouragement of quality of life, and health promotion, based on relationships of respect, equality, and trust;
- c) Ensure the right to associate with unions to promote or assist in collective negotiations, without any interference or retaliation by the company;
- d) Follow applicable legal provisions, as well as regulatory bodies and universal human rights norms;
- e) Guarantee all workers the rights established in the current federal legislation and in Collective Labor Agreements and Conventions;
- f) Prevent discriminatory and prejudiced practices and behaviors in the workplace;
- g) Prohibit any forms of harassment, coercion, and/or physical and mental punishments;
- h) Support the eradication of child labor, slavery, and degrading work conditions;
- i) Promote and adopt measures to combat child labor, supporting its eradication.

#### 4.2 Guiding Principles on Human Rights

Vancouros is committed to adhering to national policies and regulations governing individual and collective labor relations, while always respecting the working conditions established by the Consolidation of Labor Laws.

The company will also remain vigilant regarding international recommendations that advocate for best practices in human rights development and security, worker health and safety, and will direct efforts to incorporate intervention and management practices aimed at adopting the principles of:

- ✓ The Universal Declaration of Human Rights by the UNO;
- ✓ The Ten Principles of the UNO Global Compact;
- ✓ Declaration on Fundamental Principles and Rights at Work by the ILO;
- ✓ The UNO Guiding Principles on Business and Human Rights.



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The company ensures to establish proper coherence between the ILO and UN Guidelines in relation to employees and the performance of their activities in our operations.

These guidelines, in turn, are elaborated through the definition of improvement actions, through the monitoring of implemented prevention measures, the need to be accountable to stakeholders, and the assessment of other identified needs, defined as preventive and educational actions.

Through a robust governance system, the company ensures compliance with the Human Rights Policy. It is expected that business partners adopt these ethical principles in their operations.

The company will periodically monitor and evaluate the results of its initiatives, proposing improvement actions as needed.

The Human Rights Policy should be regularly assessed to ensure its alignment with current laws, regulations, and recommendations from international organizations focused on human rights.

### 4.2.1 Working conditions

Vancouros ensures compensation and benefits, as well as working hours, in accordance with the provisions of the current legislation, agreements, labor conventions, and relevant norms. Our contracts are appropriate and clearly presented to employees, in line with the law. Vancouros respects the minimum wage of the category and adopts practices of transparent and non-discriminatory recruitment.

Women's rights are upheld across all levels of our operations, recognizing the importance of promoting gender equality and equity in the workplace. Equal opportunities are guaranteed for all female employees, treating them with respect regardless of gender, valuing diversity, and encouraging full and active participation of women at all levels of the company.

Committed to the safety and well-being of our employees, Vancouros establishes a work environment that prioritizes the physical and emotional integrity of everyone. The goal is to provide a safe workplace where each employee can perform their duties with peace of mind and without risks to their health and safety.

### 4.2.2 Child labor, slave like, and forced labor.

Vancouros is committed to adhering to national policies and regulations that govern the human rights of its employees, strongly rejecting forced and child labor. Employees below the legally established minimum age are not allowed.

Human rights must be respected, and all employees should have the freedom to choose whether to join the workforce in a voluntary and free manner. The use of slave like labor, compulsory labor, military labor, and/or other forms of modern slavery is not



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accepted. Physical punishment is not practiced, and abusive and/or coercive disciplinary practices are not tolerated.

Furthermore, any form of slavery, servitude, forced or compulsory labor, or human trafficking is not tolerated. Suppliers are also required to share this commitment and adopt concrete measures to prevent and eliminate such practices in their own operations.

### **4.2.3 Non-discrimination and harassment**

Vancouros understands and values the multiplicities and diverse social and cultural perspectives present, and therefore adopts an equal and unbiased approach regarding origin, religion, marital status, sexual orientation, social class, political choice, race, color, gender, age, disability, country of origin, and/or any other illegitimate aspect related to discrimination.

Additionally, it supports and guarantees the full realization of the rights of ethnic minorities, which also includes indigenous peoples. This approach is grounded in the principles of equality and non-discrimination.

Vancouros provides equitable access conditions, with a non-discriminatory remuneration structure, taking into account development and career advancement through fair hiring practices. It ensures an ethical and humane work environment, treating everyone with equity and respect while upholding the dignity of each employee.

The company does not tolerate any form of harassment or abuse, whether emotional, physical, or mental. It encourages anonymous and good-faith reporting, ensuring no retaliation against the individual and applying disciplinary and punitive measures to eradicate acts of discrimination and harassment.

### **4.2.4 Freedom of association and collective negotiations**

Vancouros strictly adheres to guidelines concerning the right to freely form labor associations as well as engage in collective bargaining. It recognizes and values the importance of unions as representatives of employees' interests and respects the collective agreements entered by them. The company ensures that employees can choose their representatives freely, without facing any consequences, repression, harassment, or penalization for their choice or involvement with such representations.

The company addresses all complaints related to workplaces and workers in an ethical and integral manner, free from any form of retaliation against employees who express their concerns. It fosters an environment open to dialogue, where work-related issues can be discussed constructively, respecting the rights and opinions of all involved parties.



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### 4.2.5 Right of the land, water and forests

Vancouros values the rights of the land, water, and forests, recognizing their importance for local communities and the environment. It operates responsibly, respecting the rights of communities and utilizing these resources in a sustainable manner.

The company prioritizes dialogue and prior consultation with communities, aiming not only to avoid adverse impacts but also to ensure that practices align with legal and environmental standards. In doing so, it ensures that operations do not cause harm or negatively affect communities. Vancouros practices environmental conservation, collaborates with impacted communities, and upholds a commitment to social justice.

## 5. RESPONSABILITIES

### 5.1. Executive Board

- Ensure the alignment of Human Rights guidelines with the organization's values and mission;
- Maintain and uphold a commitment to the well-being, health, and safety of workers who generate the company's wealth and value;
- Consider the Human Rights Policy in the organization's strategic decisions;
- Approve general policies and promote practices that aim to ensure the rule of law for employees;
- Define roles, responsibilities, and assignments, delegating authority to facilitate effective employee management in conjunction with applicable legal requirements;
- Ensure the availability of essential resources to establish, implement, maintain, and improve Human Resources Management, including people with ongoing training and the necessary organizational, technological, financial, and related;
- Ensure that Human Resources Management is established, implemented, and maintained in accordance with this Policy; and
- Ensure that all those with management responsibilities demonstrate their commitment to the continuous improvement of Human Resources Management performance, promoting cooperation and communication among all those working to implement this policy and its.

### 5.2. Human Resources Directors

- Promote thorough understanding of the Human Rights Policy among the workforce, so that our activities are carried out in a socially responsible manner.
- Define, update, and inform relevant parties about the roles, processes, and organizational mechanisms that enable effective management of actions and resources for the well-being, health, and rights of employees.



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- Observe and comply with regulations and laws concerning working hours, working conditions, harassment, non-discrimination, freedom of association, and collective bargaining;
- Provide guidance, validate, and oversee people management processes or enhance them with actions aimed at maintaining the well-being, health, and positive work environment of employees throughout their entire relationship with the Organization, spanning from the recruitment and selection of professionals to their departure or retirement;
- Ensure that any employee under your supervision involved in activities/operations that could impact human rights and working conditions possesses skills/competencies based on qualifications, certifications, training, authorization, and/or legal prerequisites to meet the requirements of this policy;
- Identify training and development needs related to dignified conditions and workers' rights, and establish appropriate actions to address them; and
- Set indicators for evaluating the effectiveness of training and development actions, and maintain associated records.

### **5.3. Human Resources Department**

- Provide technical knowledge to underpin Vancouros strategic directions concerning human rights and working conditions, relying on research, reliable data, and best practices to support decisions, as well as influencing areas of interest to foster a collaborative environment free from discrimination, retaliation, and morally safe;
- Identify, measure, monitor, control, propose solutions, and track significant/prevalent risk factors that threaten human rights, working conditions, non-discrimination, freedom of association, and collective bargaining for employees;
- Mobilize and engage people, departments, and partner companies to adopt work and/or management practices that ensure employees are safeguarded with regard to their human rights, working conditions, harassment, non-discrimination, and freedom of association and negotiation while performing their duties;
- Manage, monitor, and report on key initiatives and outcomes related to the requirements of this policy within Vancouros, which includes resource management and related aspects;
- Propose and implement quality of life and healthy environment programs and initiatives suitable for the profile and needs of Vancouros tannery employees.

### **5.4. Managers**

- Ensure a retaliation-free work environment in accordance with the principles of this policy for all individuals under their;





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- Support and diligently oversee compliance with human rights and working conditions guidelines, as well as relevant legal requirements applicable to Vancouros;
- Guarantee a humane working environment for employees;
- Identify irregularities and deviations that jeopardize the moral and ethical principles of this policy, assisting in the implementation of corrective actions;
- Establish conditions for and encourage employee engagement with the culture of non-harassment, non-discrimination, quality of life, and well-being fostered by the organization.

### **5.5. Employees and Third Parties**

- Respect and adhere to the principles of human rights, contributing to a culture of non-harassment and non-discrimination in the organization's daily activities;
- Engage in initiatives and contribute to discussion groups on diversity, respect, moral and ethical integrity, with the aim of continuous improvement within the organization.

### **5.6. Suppliers**

- Adhere to recommendations from the Brazilian Labor Consolidation Laws (CLT), International Labour Organization (ILO), and United Nations (UNO) regarding forced labor, discrimination, non-harassment, wages, benefits, and working hours;
- Ensure compliance with national norms and legislation related to labor rights, human rights, and working conditions;
- Observe and adhere to practices adopted by Vancouros, especially when present within the company premises.



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