



Human Rights Policy

Reflex Group is committed to the highest standards of business and ethical behaviour including compliance with all applicable laws and regulations, as well as company policies, procedures, and practices. We respect the internationally recognised Human Rights as established in the Universal Declaration on Human Rights and the International Labour Organisation's Core Conventions.

In line with the UN Guiding Principles on Business and Human Rights, we recognise our corporate responsibility to respect these principles and commit to on-going human rights due diligence. Our efforts include ongoing robust engagement with our business and major supply chain partners to mitigate potential human rights impacts beyond our direct control.

Our support of internationally recognised Human Rights is consistent with our dedication to our workplace, partnering with our supply chain, preserving the environment, and supporting the communities where we operate.

1. Purpose

The purpose of our documented policies is to provide an overview of expectations for employees and business partners.

In addition, our Human Rights policy exists to:

- Inform employees, customers, and business partners to Reflex Group's commitment to human rights
- Establish our commitment for respect for human rights through on-going human rights due diligence
- Maintain our high ethical standards
- Contribute to the realisation of global human rights

2. Policy scope

Reflex Group Human Rights policy applies to all our employees in all locations, anyone doing business with or for Reflex Group and other's acting on our behalf. This applies to all locations where Reflex Group conducts business and all company events.

3. Definitions

Human Rights are basic rights inherent to all human beings, regardless of nationality, place of residence, sex, sexual orientation, national or ethnic origin, colour, religion, language, or any other status.





4. Guidelines

Reflex Group conducts its business in a manner that respects the rights and dignity of all people, complying with all applicable laws and regulations. Our policies reflect our commitment to respecting the protection of internationally recognised Human Rights.

- All employment with Reflex Group is voluntary. We do not use child or forced labour in any of our operations. We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude. We fully respect all laws establishing a minimum age for employment, in order to support the effective abolition of child labour worldwide.
- All employment with Reflex Group is voluntary. We do not use child or forced labour in any of our operations. We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude. We fully respect all laws establishing a minimum age for employment, in order to support the effective abolition of child labour worldwide.
- Reflex Group abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- We respect our employees' right to choose to join or not to join a trade union, or to have recognised employee representation in accordance with local law.
- We embrace diversity and recognise that a diverse mix of backgrounds, skills and experiences drives new ideas, products and services and provides us with a sustained competitive advantage.
- We believe everyone should be treated with respect regardless of their background. We are committed to the elimination of discrimination based on gender, race, class, economic status, ethnic background, sexual orientation, age, political beliefs, veteran status, marital status or any other protected class.
- We have a requirement for all suppliers, vendors, contractors, consultants and agents to adhere to our labour standards and policies.

In addition, we follow these principles:

- Reflex Group respects all human rights;
- Reflex Group commits to conducting on-going human rights due diligence to assess and mitigate potential human rights infringements
- Reflex Group expects those with whom it does business with to respect all human rights.

5. Compliance

Employees and suppliers are expected to comply with this and all applicable Reflex Group policies. Violation of this policy or the refusal to co-operate will result in disciplinary action, up to and including dismissal and referral to the appropriate authorities, where we have reason to believe that our partner organisations infringe Human Rights, we reserve the right to cease those relationships.

Employees and suppliers are expected to:

- Never infringe on human rights
- Be alert to any evidence of human rights infringements in our direct operations or in the operations of our business partners, and report any situation in which a human rights infringement is suspected.





6. Responsibility

The Human Rights policy is maintained and reviewed annually by the Human Resources Department. Human Resources is responsible for the creation, administration, updating, reviewing and communication of this policy.

7. References

This policy reinforced our other relevant policies including Child Labour Policy, Ethical Trading Policy, Anti-Bribery Policy and Modern Slavery Statement. For further information regarding human rights, please refer to:

- Universal Declaration of Human Rights: <http://www.un.org/en/documents/udhr/>

Last Reviewed January 2025

Next review due January 2026

