

# Human Rights Policy

Asteelflash strongly believes that the corporate has the responsibility to respect human rights. We are committed to protecting and promoting human rights with our employees, joint ventures, suppliers, business partners, clients, local governments, communities, and other stakeholders.

Asteelflash supports and respects human rights as defined in Principles 1 and 2 in the United Nations (UN) Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labor Organization's Declaration of Fundamental Principles and Rights at Work, and the laws of the countries in which we operate. We adopt a Code of Conduct in our global operations to enforce our commitment to protecting human rights.

In line with these standards, Asteelflash adopts this Policy to convey our commitment to all stakeholders. This policy will be reviewed annually and updated to ensure its effectiveness.

## **Our commitment to enforcing human rights protection through these principles:**

**\ Diversity and Anti-discrimination:** We respect the diversity of our employees, suppliers, business partners, communities, and all other stakeholders. We strictly prohibit discrimination based on ethnicity, color, gender, gender identity, sexual orientation, marital status, language, age, nationality, religion, political affiliation, citizenship, ancestry, physical or mental disability, pregnancy, illness, or other characteristics protected by law.

\\ **Respect and Humane Treatment:** We are committed to treating people with respect and humanity. It is not tolerated to have any form of disrespectful or inappropriate behaviors in the workplace and work-related environment, including but not limited to sexual harassment, maltreatment, corporal punishment, mockery, insult, discrimination, hatred, derogation, threats, hostile behavior, interference, tracking, mental coercion, and aggression, etc.

\\ **No Forced Labor and Human Trafficking:** Being an employer and a global corporate citizen, we firmly forbid any type of forced labor, including human trafficking and illegal employment, and ensure all employment is built upon willingness, which means all employees have the right to choose or terminate their employment with the reasonable notice period in compliance with local laws.

\\ **Child Labor and Young Workers:** Any form of child labor is strictly prohibited. And there is no tolerance to employ young workers aged 18 or below to perform any work that could jeopardize their health and safety, including night shifts and overtime.

\\ **Compensation, Benefits and Working Hours:** All relevant laws and regulations on salary, social security, working hours, etc. are in compliance with the country or the jurisdiction where our operations are located.

\\ **Safety and Health in the Workplace:** We are committed to providing our employees with a safe and healthy work environment and striving for zero injuries and accidents by complying with all applicable health and safety regulations and ensuring all procedures are right in place.

\ **Freedom of Speech and Association:** It is fully respected and supported that all employees have the right to freely associate and express their points of view. We are dedicated to building trust and a positive environment where employees can share their concerns or suggestions without fear of interference, intimidation, reprisal, discrimination, or harassment.

\ **Protection of Privacy:** We recognize privacy, as a fundamental human right, shall be protected. Therefore we strive for safeguarding personal data privacy and data security.

\ **Conflict-Free Minerals Commitment:** Keeping with Asteelflash Conflict-free Mineral procurement commitments, no metal or product from conflict minerals or areas that violate human rights is purchased or used in Asteelflash manufacturing and production.

\ **Grievance Mechanism and Whistleblower Protection :**  
    \ Ensure Asteelflash's formal grievance mechanism accessible and effective. For any violation, one can provide specific facts, related information, and documents to Asteelflash through the grievance channels non-anonymously or anonymously. The informant and the reported content will be strictly kept confidential and the appropriate protection measures will be taken in accordance with the laws to secure the personal data and privacy of the informant. There's no tolerance for any form of retaliation against those who report in good faith or assist in the investigation.

    \ Internal grievance channels are including but are not limited to the Human Resources mailbox, employee complaint hotline, and reporting mailboxes in each country.

    \ External reporting can be made through phone calls, post mail addresses, and E-mail ([info@asteelflash.com](mailto:info@asteelflash.com))

    \ Investigations will be conducted by a review committee to respond to the allegations in a rigorous and prompt manner. And the responding actions will be taken to mitigate any adverse impacts on human rights.

Gilles Benhamou,  
President  
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