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Human rights policy

Issued by: Group HR

Approved by: E. Souliotis, Group HR Director

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Revision History

Date	Rev. No.	Description of Revision	Revision Author	Approved by
08.05.2018	01	Towards compliance with SA8000	F. Vintzileou, HO HR Supervisor	E. Souliotis, Group HR Director
12.09.2019	02	Towards compliance with SA8000	F. Vintzileou, HO HR Supervisor	E. Souliotis, Group HR Director

1. Purpose

In Frigoglass we value our people and our success depends on them. All of our employees should work in a safe, positive and supportive environment with the highest ethical standards to support and safeguard their rights. To ensure the well-being of our people, we put forward the Human Rights Policy which covers all the elements of SA8000 policy and provides the principles we follow in our processes across the organization. The policy is guided by the [International Bill of Human Rights](#) and the [ILO Declaration on Fundamental Principles and Rights at Work](#).

2. Scope

This policy applies to Frigoglass Group and all its legal entities. We are committed to live up to the principles of this policy. Frigoglass has legal entities in multiple locations and it operates in compliance with all applicable laws (national or international depending on which ones are legally binding). In this context our target is to train on Human Rights Policy the total population of permanent employees.

3. Principles and performance criteria

3.1. Discrimination

All employees are hired based on their fit to the role requirements and once employed are evaluated solely and rightfully according to their performance versus the requirement of the role. No employee should be treated differently on the basis of ethnic origin, citizenship, marital status, color, religious beliefs, gender, sexual orientation, age, disability, political preferences, socioeconomic status, union membership, veteran status and any other trait or belief. All forms of discrimination and inequity are prohibited throughout the searching, hiring and employment. All employee rights are safeguarded and protected from such cases of bias and prejudice.

3.2. Forced labor and child labor

We prohibit all forms of forced and compulsory labor, the engagement in human trafficking and the slavery or servitude. We prohibit child labor and no person is hired under the legal age of employment in no circumstances (ILO Convention 138). We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required, as provided for in ILO Convention 182.

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3.3. Freedom of association and collective bargaining

All employees have the right to join, form or not join a labor union or any other bodies freely elected by them to represent their collective interests. In the legal entities we have unions or employee representatives-legally recognized- we are having a constructive dialogue with their freely chosen representatives. We are committed to bargaining in good faith.

3.4. Fair compensation

We compensate employees competitively based on the role, internal equity, market & industry practices without any form of discrimination. We comply with all national laws on wages, overtimes and working hours. We respect the right of employees to a living wage. In this context, our target is that the total population of permanent employees will be covered by social benefits, in compliance with local legislation.

3.5. Health & safety

We are committed to provide a healthy and safe workplace to our employees. Where necessary, employees will be provided safety equipment as appropriate to the work being performed such as uniforms, footwear and personal protective equipment. Employees are to be provided with ready access to locker room, showers as needed, clean toilet facilities, drinkable water and sanitary food preparation, storage and eating facilities as per local regulations. We prohibit any form of actual or threaten violence and harassment in the workplace and we comply with applicable and relevant health and safety laws. We are dedicated to provide a workplace that is productive by minimizing the risk of accidents, injury and exposure to health risks. Human Rights Policy F1 - Internal Use 2 Human Rights Policy.

Our target for accidents is zero (0), thus, frequency and severity rates are also targeting zero (0).

3.6. Environment

We are committed to protecting the environment by minimizing and mitigating environmental impacts throughout the life cycle of our operations. Protecting people and the environment is a key value at Frigoglass. We maintain the safety and health of everyone and the quality of the environment wherever we operate. All of us are responsible for complying with applicable Company policy and government laws and regulations and for fully committing to the requirements of the OHSAS & ISO in our work activities –where applicable.

3.7. Disciplinary practices:

We treat all employees with dignity and respect. We have zero tolerance of corporal punishment, mental or physical abuse of employees, harsh or inhumane treatment.

In the context of continuous improvement, the above performance criteria shall be achieved by:

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- Systematically implementing the requirements of SA 8000
- Setting and periodically reviewing Social Accountability objectives and targets
- Enhancing awareness among employees and interested parties through their active participation

The company's management is committed to actively participate in System implementation and provide resources at all levels (human - material - finance) that will contribute to continuous improvement.

4. Channels of communication

In Frigoglass, we are committed to always put these policy in effect. We are working to ensure that available channels of communication are in place at all times. Any concerns or matters our employees want to voice they can do through their line managers, HR representatives, any member of the Corporate Compliance Committee or the Head of Corporate Governance. 24/7 they can use our Speak Up helplines. Names and numbers are available in our Code of Business Conduct and the Company's intranet.

Additionally, for any issue or reference regarding our Corporate Responsibility Policy or Accountability System, interested parties can contact the following institutions:

ACCREDITATION BODY

Social Accountability Accreditation Services (SAAS)

e-mail: saas@saasaccreditation.org

SOCIAL ACCOUNTABILITY INTERNATIONAL (SAI)

e-mail: info@sa-intl.org

CERTIFICATION BODY

European Inspection & Certification Company S.A. (EUROCERT)

e-mail: eurocert@otenet.gr

The company retains its right to update and amend this policy at any given time.