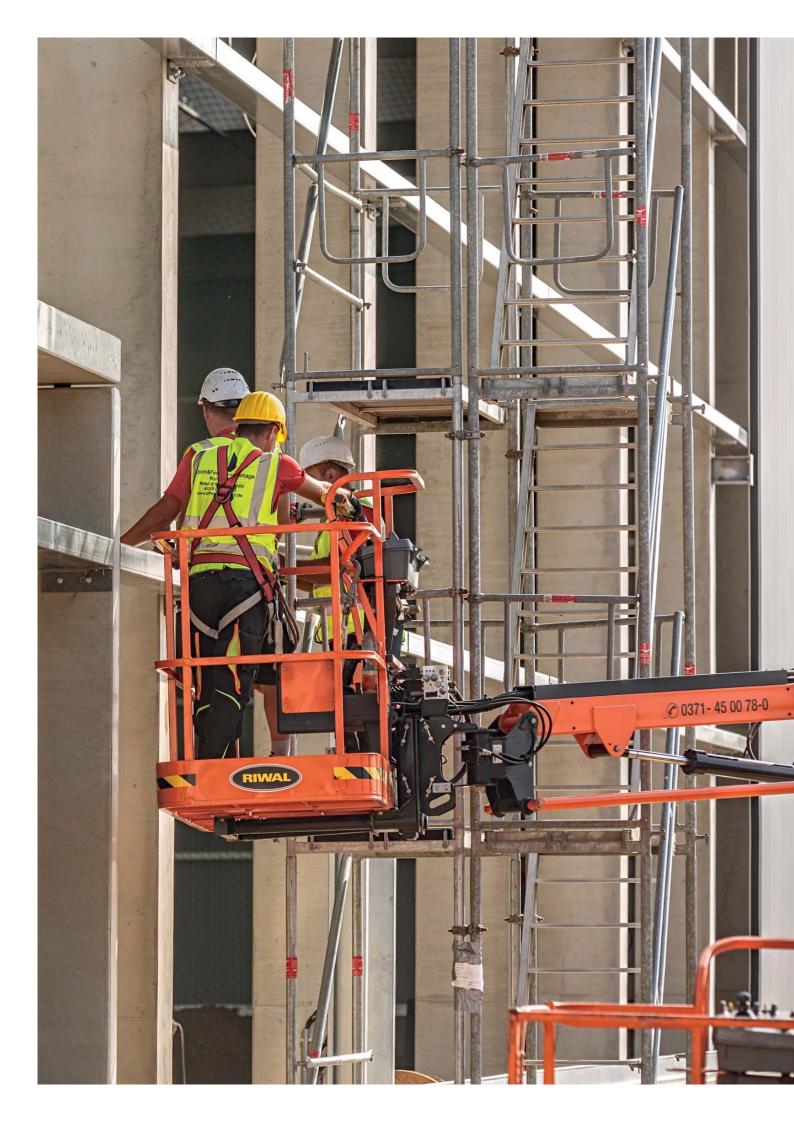


# Human Rights Policy www.vgpparks.eu

VERSION 1.0 / 15 February 2023



# VGP Human Rights Policy

VGP's Human Rights Policy, in conjunction with various Group-wide policies, reflects its commitment to protect human rights within the company's sphere of influence by adopting responsible workplace practices, and conducting business operations in a manner that preserves the dignity and respect of all people with whom the company engages. As a result, VGP encourages the advancement of human rights in our relationships with our employees, suppliers, contractors and sub-contractors, business partners, investors, clients and communities in which we work. We continuously strive to do better and we expect the same of our partners. More information about VGP's commitment to protecting human rights, implementation and enforcement can also be found in VGP's **Code of Conduct**. As a family-owned business we think across generations. We operate in a responsible and sustainable manner, striking the right balance between results, tradition and innovation. Our business is driven by prosperous, longterm relationships. We strive to create value and be a trusted partner to our customers and the communities in which we operate by emphasizing our commitment to ethical business practices to protect, preserve and enhance human rights within our sphere of influence. Our core values also direct our social responsibility principles and efforts to invest in our local communities.





VGP believes all workers are entitled to have equal footing when it comes to their conditions of employment without fear of discrimination or retaliation related to the hiring, compensation, promotion, discipline or termination. To that end, VGP provides equal employment opportunities to all individuals free of discrimination and harassment regardless of race, color, religion, sexual orientation, gender identity, marital status, national origin or ancestry, caste, sex, age, physical or mental disability or medical condition. Our workers can expect equal pay for equal work, and to gain access to an industry that may have traditionally underserved certain groups through our inclusion and diversity initiatives as stated in the Group's Diversity Policy.

VGP explicitly prohibits the use of modern slavery<sup>1</sup>, human trafficking and unlawful child labour for our own operations, for our suppliers as part of the **VGP Supplier**  <u>Code of Conduct</u>. All workers must be of at least the relevant national working age in the markets in which we conduct business. In addition to prohibiting unlawful child labour, VGP also has a strict prohibition against any kind of forced or indentured labour. This includes protecting workers who may be uniquely vulnerable because of their status as foreign or migrant workers.

Safety is an inherent and fundamental right that every working person must be given. Consequently, we insist on maintaining a safe and healthy work environment for our own workforce, as well as the third parties with whom we engage, in compliance with all applicable laws through various policies and procedures, as well as binding contractual provisions. To that end, VGP actively promotes policies and procedures that continually improve our existing safety framework. To ensure all of our employees and third-party contractors speak up when a safety concern arises, VGP implemented a **Safety and Compliance** Hotline that is published at each of our projects where anyone can report potential safety violations anonymously.

<sup>1</sup> Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labor, bonded and child labor and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of human rights.



Part of a safe and healthy work environment, VGP prohibits the inhumane treatment of any person within its sphere of influence and requires that all persons be treated with dignity and respect without fear of harm or abuse. Physical, mental, or emotional abuse of workers is not only unacceptable, but resources should be made available to workers to maintain their overall healthy wellbeing.

VGP adheres to all local laws and regulations, including those that provide the local workforce with the rights to collective bargaining and freedom of association. Interference with workers seeking to organize or carry out union activities, using intimidation, retaliation, or harassment in violation of applicable law are wholly unacceptable.

Furthermore, VGP complies with all local laws regarding working hours, as well as equal and fair compensation that improves the quality of life and financial security of our employees. VGP expects nothing less from its suppliers and third-party vendors.

### SPHERE OF INFLUENCE

This policy applies to VGP, the entities wholly owned, our joint ventures, our employees, our suppliers, business partners, investors, customers and communities in which we work.

#### BOARD AND EXECUTIVE GOVERNANCE AND OVERSIGHT

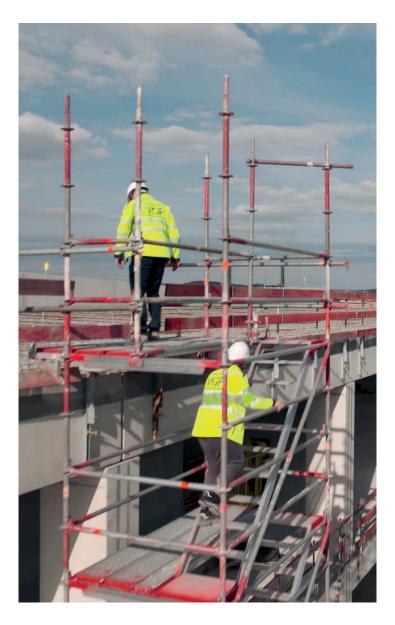
VGP's board reviews and provides recommendations for the company's ESG (environmental stewardship, social responsibility, and governance) activities, goals and policies on an annual basis. They review the adequacy of our governance guidelines and focus on reputational and corporate governance. VGP executives have oversight over human rights, ethics, compliance, ESG, and inclusion and diversity.

#### IMPLEMENTATION AND ENFORCEMENT

Every VGP employee is responsible for their own business conduct and is encouraged to speak up if something does not seem right. Our Code of Conduct and our Anti-Bribery & Anti-Corruption Policy can be found on our website. VGP's contractors follow policies and responsibilities set out in our **Supplier** Code of Conduct. VGP's anonymous **Compliance Helpline** is available to internal and external stakeholders to report potential misconduct or improper workplace practices 24/7 and 365 days a year. All reports are submitted anonymously and are thoroughly evaluated. The responsibilities of the VGP Compliance department include setting and updating the ethics policy, overseeing employee compliance and code of conduct training, providing guidance and advice to employees and investigating reported incidents of non-compliance.

## REPORTING

VGP reports information on our commitment to Human Rights through the annual Corporate Responsibility Report. Reporting is transparent, accurate, timely and complete.



VGP NV Generaal Lemanstraat 55 box 4 2018 Antwerp Belgium TEL +32 3 289 14 30 FAX +32 3 289 14 39 E-MAIL\_info@vgpparks.eu

www.vgpparks.eu