



AEROTEH S.A.

**Bucharest
Romania**

2024

**LABOUR AND
HUMAN RIGHTS
POLICY**



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AEROTEH S.A.

LABOUR AND HUMAN RIGHTS POLICY

1. Introduction

1.1. Purpose and Scope of the Policy

The purpose of this policy is to emphasize the firm commitment of the top management of AEROTEH S.A. to respecting and promoting workers' and human rights in all its operations. This policy will form the basis of future documents specific to this field addressed to AEROTEH S.A. employees, regardless of their position or level in the Company, as well as business partners, subcontractors and suppliers. The policy defines the standards of ethical and professional behaviour that AEROTEH S.A. expects from all its employees and collaborators, in order to ensure a fair, safe and respectful work environment for all.

1.2. Vision and Commitment of AEROTEH S.A. to Labour and Human Rights

The Company AEROTEH S.A. bases its activity on the principle that respect for human rights and adequate working conditions are fundamental to the success and long-term sustainability of the business. The Company is committed to protecting and promoting the rights of its workers, including occupational safety and health, work-life balance, constructive social dialogue and opportunities for training and professional development. Also, AEROTEH S.A. recognizes the importance of diversity, equity and inclusion and is committed to combating all forms of discrimination, forced labour or child labour in all its operations.

By adopting this policy, the top management of AEROTEH S.A. assumes the responsibility to contribute to the creation of a fairer and more sustainable world, putting human rights and respect for the dignity of each individual at the centre of its business strategy. This vision is shared and supported by all employees and partners of AEROTEH S.A., who are encouraged to adhere to these principles and actively contribute to their fulfilment every day.

2. Workers' Rights

2.1. Health and Safety

The health and safety of employees is a fundamental priority for AEROTEH S.A.

*Dumitru Bănuț
President of the Board of Directors & General Manager
AEROTEH S.A.*

We are committed to providing a safe and healthy working environment for all our employees, promoting their well-being.

2.1.1. Principles and Commitments

- **Principle of prevention:** AEROTEH S.A. takes a proactive approach to the prevention of work accidents and occupational diseases, applying the latest and most effective safety practices and technologies.
- **Continuous commitment:** We are committed to meeting and even exceeding legal and industry health and safety standards by actively engaging in the improvement of workplace safety systems and processes

2.1.2. Quality Objectives and Improvement Strategies

- **Risk assessment:** We carry out regular risk assessments to identify potential hazards before they become serious problems.
- **Training and awareness:** We are committed to developing training and awareness programmes to ensure that all employees understand safety and health measures and apply them in their daily activities.
- **Specified objectives:** We are concerned with setting annual targets for reducing occupational accidents and illnesses, monitoring progress and adjusting strategies as necessary.

2.1.3. Risk Prevention and Employee Protection

- **Protection equipment:** We provide employees with access to the necessary personal protective equipment and train them on how to use it correctly.
- **Emergency measures:** We are concerned with implementing clear emergency and evacuation procedures and ensure that employees are familiar with these procedures.

Through these measures, AEROTEH S.A. reaffirms its commitment to maintaining the highest standards of occupational safety and health, ensuring that every employee feels valued, protected and supported in their work.

2.2. Working Conditions

2.2.1. Work-Life Balance

At AEROTEH S.A., we promote a work environment that respects and supports the balance between the professional and private lives of our employees. We are committed to providing:

- **Flexibility of the working time:** We implement flexible working options to allow employees to better manage their time between professional and personal obligations.
- **Parental leave:** We comply with the legal rules regarding parental leave, ensuring that employees can spend valuable time with their families during the important moments.

2.2.2. Remuneration and Social Benefits

AEROTEH S.A. employees receive remuneration and social benefits to reflect the value of their work and to ensure a decent life for themselves and their families:

- **Competitive wages:** We make sure that all employees are remunerated fairly and competitively based on their role, experience and performance.
- **Customised benefits:** We offer the specific benefits contained in the legal norms, thus responding to the diverse needs of our employees.
- **Performance recognition:** We award bonuses and gratifications to recognize and reward exceptional contributions to the Company's success.

2.2.3. Right to Recreate

We recognize the importance of recreation in maintaining employee mental health and well-being. In this sense, AEROTEH S.A. implemented:

- **Recreation:** We organize various and periodic sports events and competitions that allow employees to recreate from work outside of working hours;
- **Regular evaluations of the work environment:** We monitor the work environment to identify sources of stress and continuously improve working conditions.

AEROTEH S.A. is committed to creating and maintaining a work environment that supports the health, well-being and professional development of its employees by promoting work practices that respect and protect workers' rights to a healthy work-life balance.

2.3. Social Dialogue

2.3.1. Promotion of Social Dialogue and Collective Bargaining

AEROTEH S.A. recognizes the importance of social dialogue as a means to improve working conditions, to strengthen relations between employees and management and to support the Company's continuous development.

We are committed to:

- **Facilitating open communication:** We create and maintain open communication channels that allow employees and management to share ideas, concerns and suggestions in a constructive and respectful environment.
- **Supporting collective bargaining:** We recognize and support the right of employees to organize and bargain collectively through their elected representatives.

We are committed to approaching bargaining in good faith, with the goal of reaching fair and mutually beneficial agreements.

- **Promoting employee participation:** We encourage active employee participation in decision-making that affects them, including occupational safety and health, human resources policies and other matters related to the work environment.

2.3.2. Role of Employee Representatives

Employee representatives play a key role in facilitating social dialogue and ensuring that every team member's voice is heard.

AEROTEH S.A. undertakes to:

- **Recognize and respect elected representatives:** We ensure that employee representatives are recognized and respected by management, and that they have the necessary access to information and resources to fulfil their role.
- **Provide training and support:** We are concerned with providing conditions for the training and support of employee representatives to develop their skills in the field of bargaining, labour law and effective representation of their fellow workers.
- **Collaborate constructively:** We work constructively with employee representatives to identify and address workplace issues, to develop policies and practices that benefit both employees and the Company.

By promoting social dialogue and collective bargaining, AEROTEH S.A. expresses its commitment to build a working environment based on mutual respect, transparency and cooperation. We encourage an open and honest dialogue between all levels of the Company to ensure that AEROTEH S.A. remains a fair, productive and fulfilling workplace for all its employees.

2.4. Career Management and Training

2.4.1. Recruitment and Integration

At AEROTEH S.A., the recruitment and onboarding process is designed to attract, select and integrate the most talented and diverse candidates, ensuring that all new employees are welcomed and prepared for success in their new duty.

- **Fair recruitment processes:** We are committed to implementing recruitment procedures that promote equal opportunities for all applicants, regardless of gender, age, ethnic origin, religion or any other legally protected characteristic.
- **Orientation and integration:** We are dedicated to providing orientation programmes to ensure that new employees understand the culture, values and expectations of AEROTEH S.A., facilitating a smooth transition into our organization.

2.4.2. Performance Evaluation and Promotion

AEROTEH S.A. is committed to recognizing and rewarding employee contributions and achievements by providing fair opportunities for development and career advancement.

- **Performance evaluation system:** We develop and apply a transparent and objective performance evaluation system that measures employee contributions against clearly defined objectives and performance criteria.
- **Promotion opportunities:** We make sure that all promotion decisions are based on merit, performance and potential, supporting the career development of our employees and encouraging internal mobility.

2.4.3. Lifelong Learning and Professional Development

We recognize the importance of continuous employee development in maintaining a competitive and adaptable workforce. AEROTEH S.A. invests in the training and professional development of all employees.

- **Training programmes:** We are committed to providing access to internal and external training programmes, seminars and courses to support the development of employees' skills and knowledge in their areas of expertise.
- **Career development:** We encourage and support employees in their long-term career planning, being concerned with providing professional advice to explore opportunities for growth and development within the Company.

Through these initiatives, AEROTEH S.A. aims at creating a work environment where every employee feels valued, empowered and prepared to reach their full potential.

Our career management and training policy underlines our commitment to investing in our people and fostering a culture of excellence, diversity and inclusion.

***Dumitru Bănuț
President of the Board of Directors & General Manager
AEROTEH S.A.***

3. Human Rights

3.1. *Child Labour, Forced Labour and Human Trafficking*

AEROTEH S.A. expresses its firm commitment to respecting and protecting fundamental human rights in all aspects of its operations.

Our society categorically opposes child labour, forced labour and human trafficking, promoting fair and ethical working conditions.

3.1.1. **Prohibition of Child Labour and Forced Labour**

- **Zero-tolerance policy:** AEROTEH S.A. applies a zero-tolerance policy towards the use of child labour and forced labour in all its operations and its supply chain. The Company observes the legal minimum employment age according to relevant international conventions and national laws.
- **Rigorous checks:** We are committed to implementing rigorous screening procedures in the recruitment and selection process to ensure that employees meet the appropriate age criteria and are employed voluntarily.
- **Education and awareness:** We promote awareness and education of our employees and partners on the importance of combating child and forced labour, encouraging them to report any suspected cases.

3.1.2. **Preventive and Monitoring Measures**

- **Audits and assessments:** We are committed to conducting regular audits and risk assessments of our suppliers to identify and combat the risks of child labour, forced labour and human trafficking.
- **Partnerships and collaborations:** Whenever requested, we are open to collaborating with NGOs, international organizations and other stakeholders to benefit from their expertise in implementing the most effective prevention and monitoring strategies.
- **Reporting mechanisms:** We establish accessible and confidential mechanisms by which employees and other stakeholders can report violations of our policy without fear of retaliation, ensuring a prompt and fair investigation of all allegations.

Through these measures, AEROTEH S.A. demonstrates its commitment to respecting human rights and ensuring a work environment free from exploitation. Our Company is dedicated to proactively identifying and combating all forms of child labour, forced labour and human trafficking, supporting global and local human rights initiatives.

3.2. *Diversity, Equity and Inclusion*

3.2.1. **Anti-discrimination and Diversity Promotion**

AEROTEH S.A. is dedicated to creating and supporting a work environment that values diversity in all its forms. Our anti-discrimination approaches are to ensure equal treatment and opportunity for all employees, regardless of race, ethnicity, religion, sex, sexual orientation, gender identity, age, disability or any other characteristic protected by law.

- **Zero tolerance for discrimination:** We have a zero-tolerance policy for discrimination, harassment or any other behaviour that undermines the principles of diversity and inclusion.
- **Fair processes:** We make sure that all recruitment, promotion, evaluation and compensation procedures are based on merit and performance, without discriminatory influences.
- **Education and outreach:** We are committed to conducting training and outreach programmes to educate employees about the importance of diversity, equity and inclusion and how to recognize and counter prejudice and stereotypes.

3.2.2. Creation of an Inclusive and Respectful Work Environment

The top management of AEROTEH S.A. aims at cultivating an organizational culture in which every employee feels valued, respected and able to contribute to their maximum potential. Our efforts to create an inclusive work environment include:

- **Promoting dialogue and understanding:** We encourage open discussion and constructive dialogue about diversity and inclusion by providing platforms where employees can share experiences and perspectives.
- **Supporting employee resource groups:** We support the formation of groups of employees based on common interests or shared identities, giving them recognition to enhance their contribution to the work environment.
- **Adaptable and accessible work environments:** We are committed to ensuring the accessibility and adaptability of the work environment to meet the diverse needs of employees, including accommodations for people with disabilities.

Through these policies and initiatives, AEROTEH S.A. reaffirms its commitment to creating a fair, diverse and inclusive work environment. We are committed to continually evaluating and improving our efforts in this direction, recognizing that diversity and inclusion are critical to the long-term success and sustainability of our Company.

4. Training and Awareness

4.1. Education and Training Programmes

4.1.1. Training on Human Rights and Ethical Work Practices

AEROTEH S.A. is concerned with ensuring that all its employees are well informed and educated about human rights and professional ethics. The Company is developing a comprehensive training programme that will include:

- **Workshops and seminars:** Organization of regular sessions covering a wide range of human rights topics, including but not limited to preventing discrimination, understanding cultural diversity and respecting workers' rights.
- **Training materials:** Creation of digital materials accessible to our employees, anytime and anywhere, to ensure a deep understanding of ethical principles and human rights relevant to our field of activity.

- **Periodic evaluations:** To measure the impact and effectiveness of training programmes, conducting periodic evaluations and testing to ensure that information is understood and implemented properly.

4.1.2. Enhancing Employees' Outreach on Policies and Procedures

Top management's concern that employees are continually aware of the Company policy and relevant procedures is essential to ensuring an ethical and respectful work environment.

*Dumitru Bănuț
President of the Board of Directors & General Manager
AEROTEH S.A.*

To achieve this objective, AEROTEH S.A. is concerned with achieving and ensuring:

- **Orientation for new employees:** Every new employee should receive a full information package about the Company's labour and human rights policy during the onboarding and orientation programme, ensuring that they are aware of the Company's expectations from the start.
- **Regular newsletters and briefings:** Distribution of periodic newsletters and updates to keep employees informed of any changes to policies and procedures, as well as new initiatives and training programmes.

Through these education and training programmes, AEROTEH S.A. reaffirms its commitment to foster a work environment based on mutual respect, ethics and integrity, while ensuring that all employees are well trained and informed to contribute to this goal.

4.2. Internal and External Communication

4.2.1. Dissemination of the Policy and Commitments of AEROTEH S.A.

AEROTEH S.A. attaches great importance to transparency and openness in communicating its commitments to labour and human rights.

The Company is concerned with adopting various methods to ensure effective dissemination of its policy and commitments:

- **Intranet:** All policy documents are available on an internal shared directory of the Company's IT system, accessible to employees. This intranet is regularly updated to reflect any changes or additions to the existing policy.

- **Printed materials:** Brochures and leaflets outlining key aspects of Company policy and commitments are distributed to employees and relevant stakeholders. Compilation of a central file for each department manager that includes printed materials with the policies, codes and guidelines developed by the Company.
- **Meetings:** Holding meetings with employees to discuss the importance of the policy, answer questions and receive direct feedback.

4.2.2. Raising Awareness and Commitment to Human Rights

AEROTEH S.A. is concerned with raising awareness and commitment to human rights, both among employees and the wider community, by:

- **Awareness campaigns:** Implementation of awareness campaigns aimed at informing employees and the public about the importance of respecting human rights and ethical practices at work. These campaigns are promoted through the Company's website and various events.
- **Public reporting:** Publishing in the annual sustainability reports the progress made in the implementation of the labour and human rights policy, taking into account the success stories and the challenges encountered. These reports are available on the Company's website.

Through these internal and external communication activities, AEROTEH S.A. aims at building a corporate culture that values and promotes human rights and work ethics, actively involving employees and the wider community in the process. This approach not only strengthens the Company's commitment to sustainable and ethical principles, but also contributes to a better understanding and respect for human rights throughout the organization and among its partners.

5. Feedback and Continuous Improvement

5.1. Feedback Mechanisms

5.1.1. Open Channels for Feedback and Complaints

AEROTEH S.A. recognizes the importance of open communication and constructive feedback for continuous improvement of work practices and respect for human rights within the organization. In this sense, the Company has implemented the following mechanisms:

- **Dedicated email address:** AEROTEH S.A. provides a dedicated email address where employees can report any concerns or complaints. This communication channel is managed by a person appointed by the Company management, who guarantees the confidentiality and anonymity of the authors of the messages.
- **Suggestion and feedback boxes:** At the headquarters of AEROTEH S.A., a suggestion and notification box is installed, where employees can submit written feedback or complaints. These boxes are checked regularly by the person designated by the Company's management.

5.1.2. Feedback Analysis and Responses to Complaints

AEROTEH S.A. is committed to treating all forms of feedback and notifications with seriousness and professionalism, ensuring that each case is thoroughly analysed and dealt with appropriately:

- **Analysis process:** Once feedback is received, it is processed according to a procedure specific to this activity.
- **Response and resolution:** Depending on the nature of the feedback or notification, AEROTEH S.A., according to a procedure specific to this activity, may initiate corrective actions.
- **Communication of results:** The Company undertakes to communicate the results of the investigation and the actions taken following the feedback or complaints according to a procedure specific to this activity, while respecting the confidentiality of the information and the protection of the identity of the persons involved.

Through these feedback mechanisms, AEROTEH S.A. demonstrates its commitment to continuous improvement and to creating a safe, ethical and respectful work environment for all its employees.

5.2. Policy Review and Update

5.2.1. Periodic Review Process

AEROTEH S.A. engages in a continuous process of reviewing and updating its labour and human rights policy to ensure that it remains relevant and effective in the face of changes in the internal and external environment. The process includes the following steps:

- **Periodic review:** A full periodic review of the policy is carried out by a dedicated group composed of representatives from management, human resources, legal counsel and other relevant stakeholders. This review takes into account the feedback received from employees, the results of internal and external audits, as well as any changes in laws or in industry-specific practices.
- **Stakeholder consultation:** Consultations with stakeholders, including employees, trade unions and non-governmental organisations, are an essential component of the review process. These consultations ensure that the policy addresses the needs and concerns of all relevant parties.
- **Analysis of emerging trends and challenges:** Emerging trends and challenges in the field of human and labour rights are analysed to identify new areas of focus or aspects that require improvement in the Company existing policy.

5.2.2. Updates Based on Feedback and Legislative Developments

- **Integration of feedback:** Feedback received through the Company approved procedure is evaluated and, where appropriate, integrated into the policy revision. This ensures that the policy remains relevant and effectively responds to the needs and concerns of employees and other stakeholders.

- **Compliance with laws:** Any legislative changes at national or international level are closely monitored to make sure that the policy implemented by AEROTEH S.A. remains in full compliance. This includes adapting the policy to reflect new legal obligations or best practice standards in the field of human and labour rights.
- **Updates:** Based on periodic review and feedback received, the policy is updated to reflect new commitments, goals and practices. Any significant changes are communicated to all stakeholders through a variety of channels, including employee meetings, newsletters and the Company's internal platform.
- **Documentation and transparency:** The review process and any policy amendments are transparently documented. Summaries of revisions and updates can be made available to employees and stakeholders to ensure transparency and encourage an open culture of continuous improvement.

Through these processes, AEROTEH S.A. demonstrates its firm commitment to respecting and promoting workers' and human rights, continuously adapting to social and legislative developments and the needs of its employees.

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This structure of the *AEROTEH S.A. Labour and Human Rights Policy* highlights the Company's commitment to promoting and protecting workers' and human rights within its operations. This represents a clear commitment of AEROTEH S.A. to operate in a responsible and sustainable way, observing the principles of sustainable development and human rights.

