proximus Group

## Group Compliance

# Human Rights

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# 1. Introduction

Proximus is committed to the highest standards of business and ethical behaviour including compliance with all applicable laws and regulations, as well as company policies, practices, and procedures. Proximus respects 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, Proximus recognises the corporate responsibility to respect these principles and commit to 'know and show' this through on-going human rights due diligence. Proximus officialised its long-standing commitment to the UN Guiding Principles on Business and Human Rights by adhering to the UN Global Compact in December 2023.
https://unglobalcompact.org/what-is-gc/participants/161879-Proximus

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 enriching our workplace, partnering with our supply chain, preserving the environment, and supporting the communities where we operate.

# 2. Definitions

Human Rights are basic rights inherent to all human beings, regardless of nationality, place of residence, sex, sexual orientation, national or ethnic origin, skin-color, religion, language, or any other status. They are the fundamental rights, freedoms and standards of treatment adhered to by governments, businesses, and individuals around the world and to which all people are entitled. Fundamental human rights are found in the United Nations Declaration on Human Rights, the eight ILO Core Labor Conventions, and various covenants and treaties that implement these principles.

United Nations Global Compact (UNGC) is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption. The Global Compact exists to assist the private sector in the management of increasingly complex risks and opportunities in the environmental, social and governance domains, seeking to embed markets and societies with universal principles and values for the benefit of all.

Universal Declaration of Human Rights (UDHR) was enacted in 1948 by the United Nations and contains 30 high-level principles that established the modern scope of "human rights".

International Labor Organization (ILO) is the international organization under the United Nations responsible for developing and overseeing international labor standards. It is the only United Nations agency that brings together representatives of governments, employers and workers to jointly shape policies/programs promoting decent work for all.

## 3. Objective & Scope

Proximus's Human Rights Policy applies to all employees of the Proximus Group, anyone doing business for or with Proximus and others acting on Proximus's behalf.

In addition, the Human Rights policy exists to:

- Inform employees, business partners and customers of Proximus's commitment to human rights.
- Establish Proximus's commitment to 'know and show' its respect for human rights through on-going human rights due diligence.
- Maintain Proximus's high ethical standards.
- Contribute to the realisation of human rights globally.

## 4. Vision

Proximus 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 the Proximus Group is voluntary. We do not use child or forced labour in any of our operations or facilities. 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 applicable laws establishing a minimum age for employment, to support the effective abolition of child labour worldwide.

- The Proximus Group is committed to ensuring that all employees receive fair and equitable compensation. Proximus 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 join a trade union, or to have recognised employee representation in accordance with local law.

- Diversity is embraced at Proximus. We 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, sexual orientation, age, race or ethnicity, national origin, disability, physical characteristics, state of health, religious or philosophical beliefs, political beliefs, trade union beliefs, social origin or condition, family composition or marital status, wealth, or any other protected class.

- Everyone has the right to freedom of opinion, expression. This right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontier, within the limits of the law (e.g. Belgian law forbids racial hatred, negationism and incitement to discrimination, hate, violence or segregation) and, for our employees, with the respect of our social media and external communication and media policies.

- The Group Supply Chain Management System, through the Proximus Group Suppliers' Code of Conduct, includes the requirement for all suppliers, vendors, contractors, consultants, and agents to adhere to Proximus's Labour standards and Code of Conduct policies.

In addition to this, Proximus is committed to the following principles:

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

## 5. Basic Principles of Compliance

Employees and suppliers are expected to comply with this and all applicable Proximus policies. Violation of this policy or the refusal to cooperate will result in disciplinary action, up to and including termination and referral to the appropriate authorities, where we have sound reason to believe that our partner organisations infringe Human Rights, we reserve the right to cease those relationships as warranted.

Specific to this policy, 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.

This policy reinforces our Code of Conduct and other relevant policies.

## 6. Notifications of infringements

Any infringement to this policy shall be immediately reported to your direct manager for employees, your Proximus point of contact for customers, partners and suppliers. If this is not possible or inappropriate, infringements can be reported via the Whistleblowing channels or Proximus Group Compliance (group.compliance@proximus.com).

## 7. Consequences of non-compliance

Failure to comply with the present group policy may result not only in legal sanctions, but also non judicial and public determinations on failing to comply with basic human rights standards, which may have far-reaching reputational consequences.

Any violation by employees could result in disciplinary measures that may lead to dismissal, in accordance with the applicable employment regulations.

As described in the Supplier Code of Conduct, in case of violation by a supplier, Proximus may temporarily suspend the business relationship or trigger a termination right, if deemed necessary without the supplier being entitled to claim compensation.

## 8. Compliance control monitoring process

Compliance with this policy is verified through various methods, including but not limited to, audits, self-assessment, and/or feedback to the compliance office or investigations department.