

Siat recognises that its employees are the foundation of its long-term success and sustainable development. The Group is committed to creating a safe, respectful and inclusive working environment where all workers are treated fairly and have opportunities to develop their skills and contribute to the company's growth.

This policy sets out Siat's commitments regarding employment practices, working conditions, professional development and worker welfare across all its subsidiaries. It applies to all employees, contractors and business partners operating within Siat estates and facilities.

Siat's Human Resources management is guided by internationally recognised standards including the ILO Core Conventions, the UN Guiding Principles on Business and Human Rights, RSPO Principles and Criteria, SMETA and national labour regulations in the countries where the Group operates. All employees and partners are expected to comply with this policy.

PRINCIPLE



The Group commits to responsible employment and labour practices that promote positive values such as respect and dignity for all employees, diversity and inclusion within the workforce, including equal opportunity, fair compensation, safe working conditions and constructive social dialogue. In the conduct of its operations, Siat seeks to:

- Respect human rights.
- Promote fair employment opportunities and conditions.
- Professional development of employees through training and capacity building.
- Ensure fair and transparent opportunity, non-discrimination and employment practices.
- Maintain safe and healthy working environments across all operations (see H&S Policy).
- Support freedom of association and constructive dialogue between workers and management.
- Protect vulnerable groups.

IMPACT PREVENTION



Siat seeks to prevent negative social impacts linked to employment practices by:

- Implementing responsible and transparent human resources procedures and process such as recruitment, promotion, capacity building, sanctions.
- Bargaining and displaying fair conditions of services, including all employment aspects.
- Prohibiting discrimination, harassment and workplace violence.
- Ensuring fair remuneration and transparent employment conditions.
- Promoting safe working environments across plantation and industrial activities.

Human resources risks are assessed as part of the Group's sustainability and operational management processes through due diligence.

CONTINUOUS IMPROVEMENT



The implementation of this policy is monitored through internal management systems, audits and grievance mechanisms available to workers. Corrective actions are implemented when necessary and labour practices are continuously improved based on operational experience and evolving international standards.

TRANSPARENCY



Siat promotes open communication and engagement with stakeholders regarding its performance. Raising concerns is encouraged through established grievance mechanisms.

RESOURCE ALLOCATION



Siat allocates appropriate financial, technical, and human resources to ensure effective implementation of this Policy, including training programmes, safety management systems and worker welfare initiatives.

GOVERNANCE



Responsibility for the implementation of this policy lies with Group management and the Human Resources departments of each subsidiary. Managers and supervisors are responsible for ensuring that labour practices comply with this policy.

STRATEGIC PILLARS CONSISTENT WITH THE GROUP'S LONG-TERM DIRECTION

- An irrevocable commitment to develop and manage our African Edible oil & fats business to sustainability benefit all stakeholders.
- Leadership in sustainability innovation across the edible oil value chain (farm-to-fork).
- People excellence: Have the right people, from field workers to senior management, focused on strategy execution.
- Employees take ownership, play to win as a team, act responsibly and are accountable.
- Strict adherence to RSPO standards for existing and new plantations.
- Prevention of environmental risks that could result in financial loss or reputational damage.

DETAILED IMPLEMENTATION POLICY IS DEFINED IN SEPARATE OPERATIONAL DOCUMENTS, POSTED ON ALL SUBSIDIARIES BOARDS.

Human Resources Policy

Siat values its Human Resources and is committed to ensuring fairness, transparency and consistent treatment of all workers. This policy communicates the company's values and expectations. All employees, contractors, service providers and business partners operating on Siat sites are expected to comply with it.

HUMAN RIGHTS

Siat is committed to preventing any form of human rights abuse as enshrined in the *Siat Human Right policy*, the laws of the countries it operates in and the international human rights guidance¹. Group's key compliance focuses are:

- ① Respect for employees' and stakeholders' human rights.
- ② Respect for local authorities and for the rights, cultures and values of host communities².
- ③ Prohibition of intimidation and use of mercenaries and paramilitaries in company operations.

EMPLOYMENT

Siat commits to providing fair and decent employment conditions, including:

WAGES

- ① Paying wages regularly and transparently.
- ② Ensuring no unauthorized deductions from wages.
- ③ Debt bondages are prohibited³.
- ④ Wages comply with legal requirements and aim to cover basic needs while allowing discretionary income (see *RSPO living wage*).
- ⑤ Remuneration is progressively improved where possible.

CONTRACTS AND CONDITIONS OF SERVICE

- ① All employees are provided with written clear and well understood employment contracts that include terms and conditions of employment, working conditions, nature of work, regular working hours, overtime, pay, benefits, leave (entitlement, sick, maternity), deduction, duration, termination conditions (notice, reason), etc.
- ② The terms and conditions of the employment contract, or collective bargaining agreement, along with applicable labour laws, are made available and explained to workers prior to signing the contract.
- ③ A copy of the employment contract is given to workers (no substitution).
- ④ Any amendments to the contract are agreed to by the Worker.
- ⑤ Transparent, clear and understood payslips are provided. Including all information needed such as hours worked, payrates deduction, etc.
- ⑥ Personal data is protected through privacy procedures and staff training⁴.

WORKING HOURS

- ① Overtime is voluntary (consent is recorded) paid at premium rates.
- ② Workers are entitled to at least 24 consecutive hours of rest every seven-day period or two days' rest every 14 days in exceptional circumstances.
- ③ Total weekly hours including overtime may not exceed 60 hours.

PROTECTION

- ① Employees benefit from social protection systems and retirement schemes in accordance with national regulations.

NO FORCED LABOUR

- ① Work is conducted on a voluntary basis (no forced, traffic or prison Labour); See *Group Human Rights Policy*.
- ② Workers have freedom of movement.
- ③ No retention of employees' personal documents.

WORKING CONDITIONS

Siat provides safe and decent working conditions in accordance with the *Group Health and Safety Policy* and the *Human Rights Policy*.

DEVELOPMENT AND WELL-BEING

- ① Siat supports professional development, training, internal promotion and career progression based on merit and performance.
- ② Future leaders are identified through succession planning.
- ③ The company promotes initiatives that improve the well-being of workers and their families, including programs on health, education and safety.
- ④ Where housing is provided by the company, Siat ensures that it meets appropriate standards of safety, sanitation and dignity.

VIOLENCE - HARASSMENT

Siat prohibits all forms of violence threats of violence, punishment, intimidation, bullying, harassment⁵ or sexual harassment⁶, whether engaged by workers or other stakeholders operating within Siat estates:

- ① Workers understand that such behaviour constitutes serious misconduct.

Siat provides mechanisms that respect anonymity, to identify, prevent, mitigate and address issues and impacts see grievance SOP.

The Policy and related procedures are documented and socialized to all workers and relevant stakeholders.

For more information, please contact the HR Unit or visit our website: www.siat-group.com or address your complaints to grievance@siat-group.com

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- ① Victims have access to protection, anonymity and complaint mechanism.
- ② Reported cases are investigated objectively and promptly, with appropriate disciplinary action and support for victims.

The workplace remains free from racism, discrimination and exclusion.

NO DISCRIMINATION POLICY

Siat promotes equal opportunities and prohibits discrimination based on race, ethnic origin, nationality, colour, religion, disability, gender, gender identity, sexual orientation, union membership, political affiliation, age or health status, including HIV⁷. In the conduct of its business the company endeavours to:

- ① Implement non-discriminatory documented practices including for recruitment, pay, training, promotion and working conditions.
- ② Recruitment, selection, hiring, promotion, retirement, suspension, and termination are explained and documented.
- ③ Siat commits to a non-retaliation policy, to protect employees who make good faith complaints against an employer, manager or co-worker regarding inappropriate or unlawful behaviour.
- ④ All workers receive remuneration for work of equal value and evaluation, which is based on both their experience and the quality of their work.

ETHICAL RECRUITMENT AND EQUAL OPPORTUNITY

Siat is committed to responsible recruitment practices.

- ① No recruitment fees or related costs are charged to workers.
- ② Workers retain control of their identity documents.
- ③ Recruitment is based on merit, skills and experience.
- ④ With candidates of equal merit, the company prioritizes recruitment from host communities; Open positions are advertised in communities.

SOCIAL DIALOGUE

FREEDOM OF ASSOCIATION POLICY

Siat respects rights to freedom of association and collective bargaining by:

- ① Allowing workers to form or join association⁸ of their choice.
- ② Recognising workers' associations and trade unions as partners for collective bargaining.
- ③ Allowing workers associations to conduct their activities without interference. Ensure they have access to workplaces for their activities.
- ④ Prohibiting intimidation or discrimination against worker representatives and members of worker associations.

VULNERABLE GROUPS

Siat pays particular attention to protecting vulnerable and marginalised groups:

- ① Ensure mechanisms are in place for identifying affected groups and responding to complaints of discrimination.
- ② Protect migrants⁹ from abusive recruitment or employment practices.

WOMEN RIGHTS – GENDER INCLUSION

Siat promotes gender equality and equal opportunities for women:

- ① Addressing gender pay gaps.
- ② Promoting, advancing women into leadership roles.
- ③ Women's' Welfare and Empowerment Committee¹⁰ are supported and issues reported are responded by management.

The company also protects reproductive rights by¹¹:

- ① Assess maternity needs of expectant and new mothers in consultation with them and take actions to address the identified needs.
- ② Supporting access to sexual and reproductive health information.
- ③ Respecting the rights of women during the maternity period with regards to maternity leave and breast feeding.
- ④ Ensuring that pregnant or breastfeeding women do not carry out work which exposes them to hazardous chemical products.

CHILD PROTECTION

Siat applies to a zero-tolerance policy towards child labour.

- ① Employ only workers aged 18 or above.
- ② Immediately discontinuing child labour and ensuring appropriate remediation and support for the child.
- ③ Encourage workers to send their children to school. All school-age children living in company housing are expected to attend school.
- ④ Avoid business relationships with partners using child labour.

1 UN Guiding Principles on Business and Human Rights; ILO Declaration on Fundamental Principles and Rights at Work; RSPO, SMETA documents and standards; customer requirements such as the "Responsible sourcing core requirements", "Responsible partner policy", "Sustainable sourcing policy" and other customer related documents.

2 UN declaration on the right of indigenous people. UN Rights of Peasants and Other People Working in Rural Areas.

3 This includes but is not limited to the following: i) Wage deductions due to inability to meet unachievable work targets; ii) Allowing wage arrears to accumulate due to delayed payment (beyond the payment date agreed in the employment contracts) or non-payment of wages; iii) Deception in the calculation and payment of wages, including unlawful wage deductions; iv) Requiring workers to pay deposits; v) Wage advances and loans (and related interest rates) which exceed the limits prescribed by law or ¼ of the net salary; and vi) Recruitment fees and related costs.

4 EU: GDPR; Ghana: *Data protection act* (843); Nigeria: *Data protection regulation* (NDPR).

5 Harassment is defined as unwelcome words, conduct or actions that are offensive, embarrassing, humiliating or demeaning to a worker or group of workers. Workplace violence is the exercise or attempt of physical force by a person against another.

6 ILO Guide on Prevention of Sexual Harassment in the Workplace.

7 ILO conventions on remuneration and discrimination.

8 ILO Convention Freedom of Association and protection of right to Organize.

9 ILO Convention Migrant workers.

10 Also call "gender committee" or "women committee".

11 Reproductive rights are defined as legal rights and freedom relating to reproduction and reproductive health, for couples and individuals, as well as freedom to decide freely and responsibly the number, spacing and timing of children.