

APPCRO - Human Rights Policy Statement

1. Purpose and Commitment

Our company is committed to conducting business with integrity, transparency, and respect for human rights. We recognize our responsibility to uphold internationally recognized human rights principles and to ensure that our operations and business relationships are aligned with these standards.

2. International Standards

We support and are guided by the following international human rights frameworks:

- The United Nations Universal Declaration of Human Rights (UDHR)
- The UN Guiding Principles on Business and Human Rights
- The International Labor Organization (ILO) Core Conventions
- Applicable national labor and employment laws

3. Core Principles

We are committed to the following:

Non-discrimination and equal opportunity: We provide a workplace free of discrimination based on race, gender, religion, political opinion, age, disability, sexual orientation, or social origin.

Fair labor practices: We strictly prohibit child labor, forced labor, and human trafficking.

Health, safety, and well-being: We ensure a safe and healthy working environment for our employees and contractors.

We monitor health and safety incidents internally, including lost time injuries and medical treatment cases. We are committed to equal opportunity and non-discrimination across all levels of employment, including gender equality and fair compensation practices.

Freedom of association: We respect the right of employees to freedom of association and collective bargaining, in compliance with applicable laws.

Privacy and data protection: We safeguard the personal data and privacy of our employees, clients, and business partners.

4. Business Partners and Supply Chain

We expect our suppliers and business partners to share our commitment to respecting human rights and to comply with all applicable laws and ethical standards in their operations.

5. Implementation and Accountability

Responsibility for human rights lies with company management and the HR/legal functions, which oversee compliance with this policy. We regularly review our practices to ensure continuous improvement in the protection of human rights.

6. Reporting and Concerns

We encourage employees and stakeholders to raise concerns regarding potential violations of this policy through our internal communication and grievance channels. All concerns will be reviewed promptly and fairly.

7. Scope and Governance

This Policy applies to APPCRO GROUP, including APPCRO d.o.o. (Croatia), APPCRO UK, and APPCRO US, and to our employees, contractors, and direct suppliers engaged on our projects. The CEO provides oversight of human rights matters, supported by HR and the ISMS/Compliance function. Progress is reviewed at least annually.

8. Commitment to Vulnerable Groups

We pay particular attention to the rights of vulnerable groups, including women, children, persons with disabilities, minorities, and migrant workers, and ensure equal opportunity and non-discrimination. Our commitment aligns with the principles of key international conventions protecting vulnerable groups.

9. Risk Analysis and Prioritization

We conduct an annual human rights risk analysis and update it upon material changes (e.g., new country, supplier, or service). We assess risks across our own operations, recruitment and contractors, direct suppliers, customer engagements, and our digital supply chain. Risks are prioritized by severity and likelihood, considering saliency in line with the UDHR, UNGP, and ILO Core Conventions.

10. Preventive Measures

Preventive measures include employee and contractor onboarding, annual ethics/anti-harassment and privacy/security training, contractual clauses with direct suppliers, supplier screening, and secure-by-design processes aligned with our ISO 9001/27001/22301 management systems. We ensure fair compensation and working hours in line with local laws and international standards.

11. Grievance Mechanism

We maintain confidential channels for reporting concerns, available to employees, contractors, and suppliers. Reports are acknowledged within 5 business days, investigated promptly (target within 30 days), and handled without retaliation. Remediation and corrective actions are tracked to closure.

The grievance mechanism covers a wide range of human rights and environmental issues, including child labor, forced labor, discrimination, health and safety, freedom of association, environmental harm, and compliance with international conventions such as Minamata, Stockholm, and Basel.

12. Monitoring and Reporting

Documentation related to risk analysis, preventive and remedial measures, and grievance records is retained for a minimum of 7 years, in line with our ISO-certified management systems.

We monitor implementation via training completion, internal audits, supplier checks, and incident/grievance logs. Key indicators include 100% annual training completion, time to close grievances, and percentage of assessed direct suppliers. We report progress to management annually.

13. Environmental Commitment

Our operations have minimal environmental footprint; we comply with applicable environmental laws, manage e-waste through certified recyclers, and require device suppliers to meet RoHS/REACH requirements.

Responsible Person:

Miro Višić

CEO, APPCRO GROUP

  **APPCRO d.o.o.**
Zagreb, CROATIA (EU)
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"I hereby confirm that APPCRO GROUP is committed to respecting and promoting human rights in all aspects of our business operations and relationships."

Effective Date: 01/01/2024