

Human Right Statement

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Our Position

VIPA Group is a strong advocate of human rights and of combatting any form of modern slavery in its supply chain. We condemn any form of child, forced, or bonded labor, along with human trafficking by developing and implementing relative policies and measurements for us and our network of partners.

As a Group, we strive to align, promote and accelerate Circular Economy and Sustainable Development. We aligned our strategy with the Sustainable Development Goals of the United Nations, with a special focus on the 8th Goal: Decent Work and Economic Growth, which sets the basis for a more sustainable employment environment. Nonetheless, our Code of Conduct (CoC) and Sustainability & CSR Policy clarify what are our own expectations of our operations and the ones of our supply chain.

Supply Chain and Policy Development

VIPA Group is a global trader of recovered, non-hazardous, recyclable materials. Hence, we associate with numerous suppliers in different countries and jurisdictions internationally. Although most of our activities are office-based, we understand that due to its complexity, the supply chain to which we belong might entail various risks, including the ones affecting human rights. We seek to develop relationships of trust and mutual understanding with the totality of our partners and networks, as implied by our core corporate values, but in some cases that might not be enough.

On that note, we have established a due diligence process based on risk assessment tools for our existing and onboarding suppliers. Our due diligence assessment considers aspects such as respect for the law, corporate reputation, environmental protection, and labor practices. Additionally, we have developed the suppliers' Code of Conduct, a summarized version of our Code, that sets clear expectations for our partners' operations. The suppliers' CoC is sent to all of our partners to sign, along with a detailed questionnaire, and declare their alignment with our sustainable mindset and responsible business conduct.

To protect its people and the integrity of its supply chain, VIPA Group has established multiple procedures and policies relevant to the topic. Some of them are presented below:

Sustainability & CSR Policy: In alignment with our Code of Conduct, the Sustainability & CSR Policy is an insightful blueprint of how we perceive our responsibility towards our stakeholders, including the environment and the respect for human rights. VIPA Group complies with all national and international environmental laws in our business areas. Our waste materials are all included in the EU's Green Waste Catalogue, while our prime paper products are certified by the Forest Stewardship Council and the Program for the Endorsement of Forest Certification. Moreover, the Group has established its timber due diligence process, to enhance the responsible sourcing of fiber-based materials.

Open Communication Form (Grievance Mechanism): To harshen governance and combatting of relevant issues, our Group established the "Open Communication Form". The OCF represents our organization's grievance mechanism and it refers to both internal and external partners. In that sense, any VIPA

associate, from an employee to a supplier can register any violation of the CoC or concern regarding the relevant topics, anonymously. Our organization will investigate the incidents and assess potential mitigation measurements based on the issue's severity.

Human Resources Policy: Internally, HR procedures have been developed to provide our employees with step-by-step instructions that specify actions to comply with the Policies. Defining these policies and procedures is one of the core functions of human resource management. These policies include a) a Recruitment and Exit Policy, b) a Performance Management System, c) a Compensation Policy, d) a Training & Development Policy