



HUMAN RIGHTS POLICY

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HUMAN RIGHTS POLICY

1. INTRODUCTION

Dornan is firmly committed to respecting and promoting internationally recognised human rights. This commitment reflects the ethical principles and corporate culture that guide our operations and strategic objectives.

Dornan recognises the importance of proactively identifying, preventing, mitigating, and, where necessary, remediating actual or potential negative human rights impacts associated with its operations, products, services, and those of its Business Partners. To support this commitment, Dornan has implemented a formal due diligence process aligned with internationally recognised best practices.

Our approach is guided by key international and regional human rights instruments, including but not limited to:

- The United Nations International Bill of Human Rights;
- The UN Guiding Principles on Business and Human Rights;
- The OECD Guidelines for Multinational Enterprises;
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work;
- The European Convention on Human Rights;
- The Charter of Fundamental Rights of the European Union;
- The Convention on the Rights of Persons with Disabilities.
- EU Working Time Directive (2003/88/EC).

Dornan is committed to avoiding any contribution to human rights violations and to addressing any such impacts should they occur. This commitment is reinforced by our internal policies and standards, including our Employee Code of Conduct, Code of Conduct for Business Partners, and Compliance Policy.

Through this Human Rights Policy (the "Policy"), Dornan reaffirms its dedication to fostering a culture of respect, dignity, and accountability. Dornan ensures that human rights



considerations are embedded in all aspects of its business operations and decision-making processes.

2. SCOPE

This Policy applies across all Dornan operations and to all entities under Dornan's management control. It is binding on all directors, executives, and employees throughout Dornan.

Dornan requires all suppliers, subcontractors, and Business Partners to adhere to the same high standards, including full respect for internationally recognised human and labour rights, as outlined in the Code of Conduct for Business Partners.

While Dornan complies with all applicable laws and regulations in the jurisdictions where it operates, in cases where local legislation conflicts with this Policy, Dornan will apply the highest internationally recognised human rights standards.

3. COMMITMENTS TO HUMAN RIGHTS

The purpose of this Policy is to ensure that Dornan promotes and respects all human rights as recognised in applicable legislation and international agreements. While this Policy applies broadly, Dornan has identified key priority areas aligned with the United Nations Guiding Principles on Business and Human Rights, focusing on those most affected by its global operation, namely:

- Workers across the value chain;
- Consumers and end users;
- Local communities.

In implementing these commitments, Dornan gives special consideration to the rights and circumstances of particularly vulnerable groups. These include, but are not limited to: migrant workers, indigenous peoples, ethnic and cultural minorities, children and young people, persons with disabilities (including physical, mental, intellectual, or sensory impairments), the LGBTI community, and individuals or communities at risk of social exclusion.

Dornan also recognises the importance of addressing discrimination based on race, colour, national origin, ancestry, age, sex, gender identity or expression, sexual orientation, pregnancy or related conditions, marital or parental status, religion or belief, citizenship,



disability, medical condition, genetic information, military or veteran status, or any other protected characteristic.

3.1. COMMITMENTS TO WORKERS

Dornan recognises that Workers include its own employees, temporary staff, interns, and the employees and trainees of its Business Partners throughout the entire sequence of processes and relationships involved in delivering Dornan's products or services. Dornan expects all Business Partners to uphold these commitments through adherence to the Code of Conduct for Business Partners, ensuring alignment with the core conventions of the International Labour Organization (ILO) and other relevant international standards.

Dornan is committed to the following principles of action:

- **Eradication of Child Labour**

Dornan strictly prohibits all forms of child labour and slavery, in accordance with Minimum Age Convention, 1973 and actively promotes safe and protected childhood and adolescence.

- **Elimination of Forced Labour, Slavery and Human Trafficking**

Dornan rejects all forms of forced or coerced labour, servitude, and human trafficking, and works to minimise such risks across its operations and value chain.

- **Decent Work and Fair Wages**

Dornan supports decent work and fair remuneration aligned with duties performed and hours worked. Payments must be made regularly, on time, and directly, in compliance with national laws and ILO standards. Clear and accessible information on working hours, breaks, and pay must be provided to all workers.

- **Fair Working Time**

Dornan upholds the right to fair and safe working hours, including adequate rest periods, breaks, and paid leave, in line with the EU Working Time Directive (2003/88/EC). This ensures that no worker is subjected to excessive working hours that could compromise their health, safety, or well-being.

- **Diversity, Inclusion and Non-Discrimination**

Dornan fosters inclusive recruitment and work environments, free from discrimination or harassment. Discrimination based on race, nationality, gender identity or expression, sexual



orientation, age, disability, religion, political beliefs, or any other personal or social condition is strictly prohibited. Dornan also takes steps to prevent algorithmic bias in recruitment and employment decisions.

- **Ethical Recruitment and Labour Migration Practices**

Special protections are in place for migrant workers ensuring transparency in contracts and safeguarding the right to retain personal documents. Workers must be free to terminate employment without penalty, in accordance with legal and contractual terms.

- **Occupational Health and Safety**

Dornan provides a safe and healthy working environment, including appropriate personal protective equipment and access to health services. Occupational risk prevention measures are regularly updated and communicated, with a focus on both physical and mental well-being.

Accommodation and Living Conditions

Where housing is provided Dornan ensures safe, clean, and dignified living conditions, including access to water, sanitation, electricity, communication, and personal privacy. We require our Business Partners who are providing accommodation to their workers to ensure they are upholding the same standards.

Freedom of Association and Collective Bargaining

Dornan respects and promotes the rights of workers to freely associate, join trade unions, and engage in collective bargaining, including the right to strike, without interference.

- **Work-Life Balance**

Dornan supports the right to rest, holidays, and digital disconnection, and promotes initiatives that enhance the physical and emotional well-being of all employees.

- **Equal Opportunities**

Dornan ensures equal opportunities for professional and personal development, with employment decisions based on merit and ability. Equal pay for equal work is a core principle.

- **Training and Capacity Building**

Dornan invests in training and upskilling to ensure employees can perform their roles safely, adapt to evolving needs, and understand their rights and responsibilities in the workplace.



3.2. COMMITMENTS TO CONSUMERS AND END-USERS

Dornan defines Consumers and End-Users as any individuals who receive its services to meet their personal or professional needs. Dornan is committed to conducting its business in a professional, ethical, and efficient manner, guided by the principles of sustainability, inclusivity, and excellence in service delivery.

To ensure the highest standards of service and stakeholder respect, Dornan upholds the following principles and commitments:

- **Data Privacy and Confidentiality**

Dornan maintains robust administrative, technical, and physical safeguards to ensure the confidentiality, integrity, and availability of all information processed through its systems. This includes data entrusted by clients, partners, and employees.

- **Quality, Accessibility and Safety of Services**

Dornan ensures that its services and facilities are safe, accessible, and inclusive for all individuals, including those with disabilities or functional diversity.

- **Responsible Development of Products and Services**

Dornan designs its products and services based on sustainable criteria, prioritising social and environmental contributions. This includes integrating the needs of consumers, users, and society at large, applying diversity and inclusion principles.

- **Non-Discrimination in Service Delivery**

Dornan rejects all forms of discrimination in its interactions with consumers and end-users. This includes discrimination based on race, nationality, ethnic origin, gender, religion, sexual orientation, gender identity, marital status, age, disability, or any other personal or social condition. Dornan ensures equitable access to services and facilities, particularly for individuals with functional diversity.

- **Respect for Minority and Indigenous Rights**

Dornan is committed to respecting the rights of indigenous peoples, ethnic, religious, and linguistic minorities, people with disabilities, and migrant communities.

- **Free, Prior and Informed Consent**



In areas where Dornan's activities may affect local or Indigenous populations, Dornan respects their right to free, prior, and informed consultation and, where applicable, consent. In cases where displacement is unavoidable, Dornan is committed to engaging transparently and respectfully, in line with international human rights standards.

3.3. COMMITMENT TO LOCAL COMMUNITIES

Dornan is committed to conducting its operations ethically, responsibly, and transparently, with full respect for the rights of local communities, the environment, and society at large. Accordingly, Dornan is guided by the following foundational principles:

- **Protection of Local Communities and the Environment**

Dornan respects the right of local communities, including individuals and groups potentially affected by its operations, to live in a clean, healthy environment with a decent standard of living.

- **Pollution Prevention**

Dornan supports the implementation of pollution prevention measures to promote the sustainable use of air, soil, and water across all operational areas. Dornan is committed to avoiding negative impacts on community health and quality of life, while striving to advance decarbonisation, circular economy practices, and the conservation of ecosystems.

- **Health, Safety and Personal Development**

Dornan prioritises the health, safety, and personal development of its workforce and acts responsibly toward the people and societies where it operates. This includes fostering a safe and supportive work environment and contributing positively to community well-being.

- **Data Privacy and Information Security**

Dornan ensures the proper handling of personal data and confidential information, in compliance with applicable laws. Dornan maintains robust cybersecurity measures to protect the privacy, honour, and rights of all individuals involved in its activities.

- **Responsible Use of Artificial Intelligence**

AI technologies are used to enhance quality of life and personal development and must never result in discriminatory or harmful outcomes. Dornan prohibits the use of AI systems that



violate legal, ethical, or policy standards, and ensures responsible oversight throughout the AI lifecycle.

- **Rejection of Corruption and Bribery**

Dornan maintains a zero-tolerance stance on corruption, fraud, bribery, and conflicts of interest. This commitment is supported by Dornan's Employee Code of Conduct and Compliance Policy, which are designed to prevent such practices and promote ethical behaviour. Dornan rejects any actions that interfere with fair legal processes or undermine public trust.

- **Responsible Taxation and Financial Integrity**

Dornan conducts its business with fiscal transparency and integrity, protecting the interests of consumers, stakeholders, and society. Dornan rejects all forms of money laundering and is committed to fair and accountable tax practices.

3.4. SPEAKING UP AND GRIEVANCE MECHANISMS

Dornan encourages workers, contractors, suppliers, business partners, and stakeholders to raise concerns relating to actual or suspected human rights impacts. Dornan prohibits retaliation against any individual who raises a concern in good faith or participates in an investigation. All concerns will be assessed and investigated appropriately and confidentially where possible.

4. BREACHES OF POLICY

Any breach of the Policy will be taken seriously and may result in disciplinary action, up to and including termination of employment. Employees, contractors, subcontractors, suppliers, and other business partners are expected to comply with the principles outlined within this Policy.

Failure to comply may result in disciplinary action, termination of employment, suspension of work, removal from approved supplier status, termination of contractual relationships or other appropriate corrective measures.

All employees have a responsibility to report suspected breaches promptly through the appropriate internal channels outlined throughout this Policy. Dornan are committed to



investigating all reports thoroughly and fairly, and to taking correction action where necessary. Maintaining the integrity of our workplace and upholding our values is a shared responsibility.

5. IMPLEMENTATION AND MONITORING OF THE POLICY

Dornan consistently implements proportionate, risk-based measures to identify, prevent, and address actual or potential adverse human rights impacts across its operations and extended value chain.

Dornan may use a combination of the following measures to assess compliance with this Policy:

- Supplier due diligence reviews;
- Spot-check reviews and audits;
- Worker welfare assessments;
- Documentation reviews;
- Corrective action plans;
- Compliance investigations.

Business Partners are expected to cooperate with reasonable requests for information and evidence relating to compliance with this Policy.

This Policy will be clearly communicated and made accessible to all relevant employees and Business Partners and will be publicly available on Dornan's official website.

This Policy is not a substitute for common sense and good judgment. If you are uncertain about the appropriate course of action, please speak with your manager. If the issue remains unresolved, contact the Legal, Compliance and Data Protection department at: compliance@dornangroup.com.

6. REMEDIATION

Where Dornan identifies that it has caused or contributed to an adverse human rights impact, Dornan is committed to taking appropriate steps to remedy that impact and prevent recurrence.



Where impacts are directly linked to Dornan's business relationships, Dornan will work with relevant parties to seek appropriate corrective actions.

7. GOVERNANCE

Overall responsibility for the implementation of this Policy rests with the Board and senior management.

The Legal, Compliance and Data Protection Department is responsible for supporting implementation, providing guidance, monitoring compliance, and coordinating reviews of this Policy.

8. REVIEW AND AMENDMENTS

This Policy will be periodically reviewed and updated as necessary to ensure its effectiveness and compliance with relevant legal and regulatory requirements. Please contact compliance@dornangroup.com for any queries in relation to this Policy.