



Human Rights Policy

19 June 2025

Document Title:	Human Rights Policy
Description:	Internal policy setting out Accsys' Human Rights commitments and expectations
Version and Date:	19/06/2025

1. Policy Statement

- 1.1 Accsys Technologies plc “Accsys”, together with its subsidiary companies “the Group” or “we”) is a growing business with a purpose: “changing wood to change the world”. We hold a strong belief that we have a collective social responsibility to use and develop our technology to contribute to a better world. Accsys is committed to respecting the human rights and dignity of individuals within our operations, supply chain, and communities where we do business.
- 1.2 The purpose of this policy is to affirm the importance of human rights for the Group’s strategy and sustainability. It is guided by international principles including those encompassed in the UN Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, International Bill of Rights, and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, and demonstrates the Group’s respect for the aforementioned internationally recognised human rights provisions.
- 1.3 We want to contribute to sustainable development and we are continually working to support the delivery of the UN Sustainable Development Goals.
- 1.4 This policy applies together with the following Company policies and documents:
 - Code of Conduct and Ethics Policy
 - Modern Slavery Statement;
 - Health, Safety and Environment Policy;
 - Whistleblowing Policy; and
 - Supplier Code of Conduct.

2. Who is Covered by This Policy?

- 2.1 This policy applies to all individuals working at all levels, including the Senior Leadership Team, directors, employees (whether permanent, fixed-term or temporary), contractors, trainees, casual workers/agency staff or any other person working for the Group.
- 2.2 We also expect any individual or organisation working for or performing a service for the Group, such as suppliers and consultants, whilst they are working for or performing a service for the Group throughout the world, to meet the standards expected in this policy and to comply with our Supplier Code of Conduct.
- 2.3 While this policy sets out the expectations of the Group and of the individuals mentioned at clauses 2.1 and 2.2, the Group recognises that this policy may affect communities in which Accsys operates, and any other relevant stakeholders and/or other potentially affected groups.

3. Our Commitments

In accordance with relevant laws and regulations, we are committed to the following:

- 3.1 We aim to conduct our business in a manner that respects the rights and dignity of the people who we interact with in the course of our business, aiming to comply with relevant legal requirements in the jurisdictions where we are active. Where national law and the aforementioned international human rights standards differ, the higher standard will be followed. Where standards are in conflict, we seek to respect internationally recognised human rights to the greatest extent possible.

3.2 Anti-Discrimination and Anti-Harassment

We treat everyone who works for Accsys fairly and without discrimination. Our employees, agency staff and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.

We strive for and foster a workplace free of harassment and discrimination, and work to eliminate any instances of harassment and abuse. We do not tolerate discrimination or harassment on the basis of race, sex, ethnicity, national or social origin, religion, age, disability,

sexual orientation, gender identification or expression, political opinion, marital status, medical status or any other status protected by applicable law. All employment decisions for hiring, compensation, bonus, and discipline are based solely on education, training and demonstrated skills, abilities and experience.

The Group sets out more information on its approach to the prevention of harassment and discrimination in its Code of Conduct and Ethics Policy, which is available on the Group's website.

3.3 Forced and Child Labour

The Group has a zero-tolerance approach to slavery, servitude or forced/compulsory labour and human trafficking in any of our operations or supply chain. We ensure there are measures in place intended to prevent, detect and report forced or compulsory labour in any form, or activities that are known to lead to forced labour, in all parts of our organisation and supply chain.

We do not tolerate child labour in our operations or supply chain. All workers within our operations must be at least 15 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher. We expect the same in our supply chain. Upon hiring, appropriate documentation is checked for all Group employees to check age verification. If workers aged 16-18 are hired, we aim to comply with all relevant legal requirements, including work hour restrictions, hazardous work restrictions and health checks.

3.4 Fair and Ethical Business Practices

Accsys is aware of the importance of having fair and ethical business practices in place. We are committed to improving our practices to combat and prevent bribery, corruption and modern slavery and have a mandatory annual compliance training programme for all employees, which includes content on these areas. This has meant that awareness and understanding of these issues has increased, thus increasing our ability to detect and prevent these practices.

The Group sets out more information on its approach to fair and ethical business practices, including but not limited to the prevention of bribery, corruption and modern slavery in its Code of Conduct and Ethics Policy, which is available on the Group's website.

3.5 Freedom of Association and Collective Bargaining

We respect the rights of workers across our Group to participate in collective bargaining and freedom of association. Workers have the right to join or form trade unions and to bargain collectively in relation to employment related matters. Workers' representatives are not discriminated against and are able to carry out their representative functions in the workplace.

3.6 Working Time, Wages and Benefits

Working hours must comply with national laws and collective agreements and the provisions mentioned below. Working hours, excluding overtime, shall be defined by employment contract and shall not exceed 48 hours per week, except where this is allowed by national law and agreed to by the employee in their employment contract.

The Group commits to offer employees fair compensation that meets or exceeds the legal minimum standard in line with national wage laws. The Group also provides employees with all legally mandated benefits, including pension contributions, as well as optional benefits. We aspire to provide a living wage.

We work with our key suppliers, seeking to ensure that they respect their workers equally and with dignity, with an expectation that all workers are paid a fair wage that meets or exceeds the legal minimum standard and to eliminate excessive working hours for all workers in compliance with local laws.

3.8 Safe and Healthy Work

The health and safety of our employees is of paramount importance. We work to provide and maintain a safe and hygienic workplace, in consultation with our employees, by addressing and remediating identified risks to help prevent accidents, incidents, injury and health impacts. Our

internal Health, Safety and Environment (HSE) Policy further demonstrates our commitment to providing a safe workplace and complying with applicable health and safety laws, as well as internal expectations, and we have a HSE lead assigned at each facility.

We have a comprehensive risk management and process safety programmes which include a variety of risk assessment techniques to help us identify hazards and risks.

We provide access to water, sanitation and hygiene (WASH) for all employees.

Workers receive regular health and safety training, and such training is provided to new workers. For operational plant workers, this includes training on hazardous materials handling procedures, in particular in relation to the chemicals used at our sites, as well as training on emergency preparation and response. All employees have access to hazard reporting systems and as such can confidentially report any HSE concerns that they may have.

We ensure that the workplace is safe through appropriate buildings and equipment construction, and/or management, machinery safeguards where appropriate and electrical and fire safety.

3.9 Communities

We respect the human rights of people in communities that may be affected by our activities. We strive to create a positive environmental and societal impact through a variety of activities aligned with our purpose of changing wood to change the world. We make annual donations and the value reported each year covers both charitable and community activities through product and monetary donations.

3.10 Supply Chain

We seek to make agreements with our suppliers that require them to respect international recognised human rights in their work for our business.

Our Supplier Code of Conduct clearly sets out expectations and requirements for current and potential suppliers. This includes specific statements on forced labour, child labour, conditions of work, health and safety and human rights, and also sets out standards for continuous improvement.

4. How to Raise a Concern

- 4.1 We encourage our employees, suppliers, and stakeholders to speak up about any concerns. We will not tolerate retaliation or reprisal against any individuals for having reported suspected violations of this policy.
- 4.2 We strive for continuous improvement through monitoring performance and alignment with our future corporate strategies.
- 4.3 If you believe that any part of this policy has not been complied with, you should raise your concerns in accordance with our Whistleblowing Policy.

5. Responsibility for the Success of This Policy

- 5.1 Accsys' Board of Directors first adopted this Human Rights Policy on 19 June 2025 on behalf of Accsys Technologies PLC.
- 5.2 This policy will be reviewed annually, in conjunction with other relevant Company policies and documents.

Signed for and on behalf of Accsys Technologies PLC by:

A handwritten signature in black ink, appearing to read 'J. Arsic'.

Jelena Arsic van Os

Chief Executive Officer

Dated: 19 June 2025