



HUMAN RIGHTS POLICY

STRAVILLIA SUSTAINABILITY HUB

March 07th, 2025

STV.P.04.02





1. GENERAL FRAMEWORK

At Stravillia Sustainability Hub (hereinafter referred to as Stravillia), we recognize that the duty to respect human rights - universal legal guarantees that protect individuals against all actions/omissions that undermine human dignity - should be inherent to all companies. However, in the case of Stravillia, a sustainability consultancy, respect for human rights is not just a duty, but is seen as a basic element of its purpose, in accordance with our ethical principles and the Stravillia Way.

To reaffirm and formalize this commitment, we have developed this Human Rights Policy, which is communicated to all our people and made available on our website, so that it is accessible to everyone.

2. LEGAL FRAMEWORK

This policy was developed based on the United Nations Global Compact's "A Guide for Business: How to develop a Human Rights Policy".

As of this Policy, we are committed to respecting the internationally recognized human rights enshrined in the International Bill of Human Rights (which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

We are also committed to carrying out our business in accordance with the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact Principles, in addition to respecting applicable legislation and acting in accordance with the highest standards of ethics and professional conduct (according to the Code of Ethics and Conduct), stipulating that in the event of national and international laws conflicting, the one in which the protection of human rights is more demanding shall prevail.

This Policy is also based on the provisions of our following policies, to which reference will be made throughout this document:

- a. Code of Ethics and Conduct
- b. Personal Data Protection Policy
- c. Volunteering Policy
- d. Community Engagement Policy
- e. Environment Policy
- f. Training Policy
- g. Whistleblowing Policy
- h. Reconciliation of Professional, Personal and Family Life Policy

3. SCOPE OF APPLICATION

This Policy covers all our people, as well as clients, partners, suppliers and other relevant stakeholders, who are bound by it. Therefore, any behavior that calls into question any of its provisions will not be tolerated, both throughout internal operations and activities and in its value chain.

This Policy also applies to any subsidiaries that Stravillia has, or will have in the future, and their governing bodies must expressly adhere to it and its principles and provisions must be in force, regardless of local practices or level of social and economic development.



4. POSITIONING

Although we recognize the importance of all human rights equally (there are no human rights that are more important than others), we believe that, given our activity, some human rights are more urgent than others, given their greater likelihood and susceptibility to being violated. We therefore highlight the following commitments:

Diversity and Inclusion

Promoting an inclusive environment, treating all people with respect and dignity, and guaranteeing equal opportunity and treatment between people, not tolerating any form of discrimination based on age, sex, disability, gender identity, pregnancy, sexual orientation, race or ethnic origin, nationality, cultural background, religious conviction, among others.

Anti-harassment

To prevent any form of harassment (moral and/or sexual), reprimanding abusive behavior or any type of physical, verbal or psychological coercion that harasses, intimidates or humiliates another individual, always upholding dignity and respect for human beings in the workplace.

Decent Working Conditions

To provide decent working conditions for our people, guaranteeing a safe working environment that promotes the health, safety and well-being of all.

Ensuring that working hours and rest periods are respected, allowing and promoting the reconciliation of our people's professional, personal and family lives. Recognizing the importance of this issue and considering it to be fundamental, we have created a specific policy to ensure compliance with these and other provisions on the subject: [Reconciliation of Professional, Personal and Family Life Policy](#).

Fair and Equitable Compensation and Remuneration

To guarantee a fair and equitable salary for our people, opposing any form of discrimination, in accordance with the applicable law.

We therefore undertake to ensure fair remuneration, in terms of basic salary and bonuses/awards, which must be transparent and non-discretionary. In addition, we commit to carrying out regular salary reviews.

Personal and Professional Development

Promote the personal and professional development of our people by providing training opportunities internally, namely through the Stravillia Academy, as well as externally, as set out in the [Training Policy](#).

Privacy



Ensuring our people's right to privacy through our Personal Data Protection Policy.

Freedom of Association and the Right to Strike

Recognize and respect the freedom of trade union association, the right to strike and the right to collective agreements to regulate working conditions.

Right to a Healthy and Sustainable Environment

Promoting the right to a clean, healthy and sustainable environment, respecting the provisions of the Environment Policy, developed especially for this purpose.

5. COMPLIANCE AND REPARATIONS

Stravillia's Managing Partner undertakes to allocate the necessary resources to ensure effective compliance with this Policy, and is responsible for ensuring compliance with these commitments, as well as supervising their implementation in the company's processes.

However, if one of our people comes across a situation in which human rights and/or the provisions of this policy are being violated, they have a duty to immediately report it to the Management Team, which is obliged to investigate the situation in accordance with the procedure set out in the Whistleblowing Policy. In the event that such a violation comes from a supplier, partner or client, Stravillia will notify them so that they can take corrective measures and will have the right to terminate the contract if these measures have not been taken or are insufficient.

At Stravillia, we promote an environment of sharing and transparency, encouraging our people to communicate any concerns they may have regarding their rights, and we are always open to new suggestions with the aim of promoting and providing greater well-being for people, suppliers and customers and other stakeholders.

6. STRAVILLIA'S CONTRIBUTION

Because we are aware of the importance of human rights and the urgent need to raise awareness of the role of companies in this area, we will not just respect them, but are committed to making a positive contribution to them.

To this end, we have developed two policies that will promote human rights through the other initiatives put into practice by the company - the Volunteering Policy and the Community Engagement Policy.

7. APPROVAL, VALIDITY AND COMMUNICATION

This Policy was approved by the Managing Partner on March 7, 2025, and must be respected by all employees and implemented by any subsidiaries that the company has or may have. It has been communicated to all the company's employees and is also available on the company's internal network and website.

Carnaxide, Portugal, March 07th, 2025



A handwritten signature in blue ink that reads 'Francisco Neves'. The signature is fluid and cursive, with a long, sweeping tail on the 's'.

Francisco Neves
Managing Partner

