

## Human Rights, Diversity and Inclusion Policy

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Approved by: Board of Directors

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### 1. Purpose of the Policy

This Policy establishes the framework through which AUTONOM SERVICES S.A. ("Autonom" or "the Company") reaffirms its commitment to respecting human rights, promoting diversity, equal opportunities and inclusion, and preventing any form of modern slavery, forced labour, human trafficking, discrimination, harassment, exploitation, or retaliation.

The Policy seeks to ensure a uniform and coherent standard of conduct, both in the Company's own activities and in its relationships with suppliers, subcontractors, contractors, clients, and other business partners. It also establishes the principles for prevention, identification, reporting, investigation, remediation, monitoring, and sanctioning of violations, as well as the manner in which these matters are integrated into governance, human resources, procurement, compliance, audit, and sustainability reporting processes.

### 2. Scope

This Policy applies directly and in full across the entire territory of Romania, in all activities carried out by Autonom.

The Policy is mandatory for:

- all employees, regardless of position, hierarchical level, or type of employment relationship;

- administrators, directors, managers, and other persons with coordination or decision-making roles;
- temporary workers, trainees, interns, seconded persons, delegated persons, or persons on probationary periods;
- candidates and persons involved in recruitment and selection processes;
- consultants, associates, agents, intermediaries, and other persons acting for or on behalf of the Company;
- suppliers, subcontractors, contractors, and other business partners, insofar as their contractual relationship or the nature of their activity falls within the scope of the requirements of this Policy.

The Policy applies in all relevant professional contexts, including recruitment, hiring, onboarding, training, evaluation, promotion, remuneration, benefits allocation, termination of employment, procurement, commercial relationships, operational activities, business travel, events, training sessions, conferences, professional meetings, and interactions conducted through electronic or digital means for business purposes.

### **3. Reference Framework and Relationship with Other Internal Documents**

This Policy is applied together with relevant Romanian legislation, including regulations on labour, equal opportunities, non-discrimination, occupational health and safety, whistleblower protection, data protection, and combating human trafficking, as well as the Company's Sustainability Strategy, Internal Regulations, and other applicable internal policies and procedures.

In applying this Policy, Autonom also seeks alignment with relevant international standards and principles, including the UN Guiding Principles on Business and Human Rights, the fundamental conventions of the International Labour Organisation, the European Convention on Human Rights, and European best practices regarding human rights due diligence.

Furthermore, this Policy is aligned with the requirements of Regulation (EU) 2022/2464 (CSRD – Corporate Sustainability Reporting Directive), Directive (EU) 2024/1760 on corporate sustainability due diligence, and the European Sustainability Reporting Standards (ESRS), in particular ESRS S1 (Own Workforce) and ESRS S2 (Workers in the Value Chain), as well as Directive (EU) 2022/2381 on gender balance and Directive (EU) 2023/970 on pay transparency.

This Policy supplements and is to be interpreted in conjunction with the Internal Regulations, the whistleblowing policy, anti-harassment procedures, disciplinary procedures, internal data protection rules, procurement policies, and other relevant internal documents. In the event of inconsistency, the standard providing the highest level of protection for individuals and the best level of legal and ethical compliance shall prevail, within the limits of the law.

#### **4. Key Definitions**

For the purposes of this Policy, human rights means the fundamental rights and freedoms of every person, including the right to dignity, liberty, security, equal treatment, freely consented work, fair working conditions, health and safety, privacy, and protection against exploitation.

Diversity means the range of individual and group differences, including those relating to sex, gender, age, ethnicity, race, nationality, religion, beliefs, disability, sexual orientation, socio-economic status, professional experience, and any other criterion protected by law. Inclusion means the creation and maintenance of an environment in which all persons are treated with respect, have equitable access to opportunities, and can actively participate, in safety and without fear of exclusion or retaliation.

Discrimination means any difference of treatment, exclusion, restriction, or preference, direct or indirect, based on a criterion protected by law, which has the purpose or effect

of impairing equality of opportunity and treatment. Harassment means any unwanted behaviour, including moral, sexual, or protected-characteristic-based harassment, which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Modern slavery means any form of slavery, servitude, forced or compulsory labour, human trafficking, exploitation through coercion, debt bondage, or other similar forms of control or exploitation of a person. Forced or compulsory labour means any work or service imposed on a person under threat, coercion, abuse of power, deception, or without freely given consent. Human trafficking involves the recruitment, transport, transfer, harbouring, or reception of a person through coercion, fraud, deception, abuse of vulnerability, or other illicit means, for the purpose of exploitation.

Remediation means the set of measures through which a negative impact is stopped, corrected, repaired, and, as far as possible, its recurrence is prevented. Severity means the level of seriousness of an impact, assessed according to intensity, scale, the number of persons affected, and their vulnerability. Irremediability means the extent to which the impact can no longer be fully repaired or the affected person can no longer reasonably be restored to the prior situation. Leverage means the Company's ability to influence the behaviour of a third party through contractual requirements, audit, monitoring, remediation, suspension, termination of collaboration, training, or other legitimate mechanisms.

## **5. General Principles and the Company's Commitment**

Autonom bases its conduct on respect for human dignity, equal opportunities, fair treatment, integrity, freely consented work, safe and healthy working conditions, protection of vulnerable persons, prevention of any form of exploitation, and promotion of an organisational culture based on respect, responsibility, and trust.

The Company has zero tolerance for modern slavery, human trafficking, forced labour, servitude, discrimination, harassment, victimisation, and retaliation. Autonom does not accept any behaviour that affects the freedom, safety, integrity, dignity, or equality of a person and commits to preventing, investigating, and treating with seriousness any reasonable suspicion or confirmed violation.

Autonom promotes employment and commercial relationships based on good faith, legality, transparency, and respect. The Company recognises the right of persons to fair treatment, equal access to opportunities, protection of privacy, freedom of association and dialogue, as well as safe and confidential reporting mechanisms.

## **6. Governance, Responsibilities, and Resources**

The Company's management approves this Policy, oversees its implementation, and ensures that the principles set out in this document are reflected in human resources, operations, compliance, procurement, audit, and reporting processes. Management has the obligation to set the tone from the top, to support an organisational culture based on respect and integrity, and to periodically review the status of the Policy's implementation within the relevant management, compliance, HR, or operational structures, with conclusions recorded in the applicable internal records.

Managers have the obligation to effectively apply this Policy in their day-to-day activities, to prevent non-compliant behaviours, to respond promptly to risk signals, to encourage good-faith reporting, and to not tolerate retaliation or passive approaches to situations that may affect individuals, teams, or business relationships.

The relevant internal functions, including Human Resources, Compliance, Procurement, OHS, and other structures involved in risk assessment and management, collaborate to ensure the coherent application of the Policy. Human Resources plays an essential role in recruitment, inclusion, organisational climate, training, and support for affected

persons. The Compliance and/or Legal function coordinates the compliance framework, supports investigations, monitors the adequacy of controls, and ensures alignment with legal and reporting obligations. The Procurement function and supply chain managers integrate due diligence requirements, partner assessments, and leverage mechanisms into the relationship with suppliers and subcontractors.

All employees and associates are obligated to comply with this Policy, to contribute to maintaining a respectful and safe working environment, to promptly report any reasonable suspicion of violation, and to cooperate in good faith with investigations and remediation measures.

Autonom commits to allocating adequate and proportionate resources for the effective implementation of this Policy. These resources include, as applicable, designated personnel, clear responsibilities, management time, budget for training and awareness, audit and monitoring capacity, reporting tools and channels, specialised competencies, operational support for remediation, and, when necessary, access to external expertise. The adequacy of resources is reviewed periodically, at least annually, based on the Company's risk profile, incidents identified, audit results, and the effectiveness of implemented measures.

## **7. Human Rights Due Diligence**

Autonom applies a human rights due diligence process to identify, prevent, mitigate, monitor, and remedy actual or potential negative impacts associated with its activities and business relationships. This process is not exclusively internal and is not limited to reporting, investigation, and sanctions, but pursues a continuous and documented approach to risks.

Due diligence covers the Company's own activities, recruitment and personnel management processes, working conditions, health and safety, organisational climate,

relationships with suppliers and subcontractors, as well as relevant segments of the value chain. The assessment is based on complaints, relevant internal data, audit results, operational findings, supplier evaluations, risk analyses, investigations, claims, results of materiality exercises, and other credible information available.

To ensure a robust framework aligned with European best practices, Autonom may involve, in proportion to the identified risks, external human rights experts, independent auditors, specialised consultants, non-governmental organisations, professional organisations, mediators, psychologists, external legal advisors, or other competent entities. Where the nature, scale, context, or severity of the risk warrants it, external expertise will be expressly considered before adopting final measures.

The Company commits to consulting, in a manner proportionate to the risk and potential impact, the parties that may be affected or that may offer a relevant perspective on the impacts. Such consultations may include employees and their representatives, temporary workers, suppliers, workers in the supply chain, local communities, vulnerable groups, clients, civil society organisations, and other relevant stakeholders. For projects, activities, or commercial relationships with high risk or potentially significant impact on communities or vulnerable groups, Autonom pursues proactive, documented, and accessible consultation.

Risks and impacts are prioritised based on severity and degree of irremediability, taking into account, as applicable, the seriousness of effects, their scale, the number of persons affected, the vulnerability of the persons involved, the likelihood of occurrence, the actual or potential nature of the impact, the Company's degree of involvement, and the level of available leverage. In assessing severity, Autonom also takes into account the impact on the health, safety, dignity, and freedom of persons. In assessing irremediability, the Company analyses whether the impact can be quickly repaired,

recovered with effort and investment, or whether it is very difficult or impossible to fully remedy.

The highest priority shall be given to situations that involve or may involve human trafficking, forced labour, serious exploitation, restriction of persons' freedom, risk to life or physical integrity, systemic discrimination, serious harassment, retaliation, abuses against vulnerable groups, or other impacts with consequences that are difficult or impossible to repair.

## **8. Diversity, Equal Opportunities, and Inclusion**

Autonom promotes a working environment in which every person is treated with respect and has equitable access to professional opportunities. The Company applies objective, professional, and transparent criteria in all processes of recruitment, selection, onboarding, evaluation, promotion, professional development, remuneration, access to benefits, and termination of employment. Every decision regarding a person's professional trajectory must be based on competencies, performance, conduct, and the actual requirements of the role, without discriminatory influences.

The Company prohibits direct or indirect discrimination, unjustified exclusion, marginalisation, offensive language, degrading stereotypes, victimisation, and any other conduct that affects a person's dignity or creates a hostile environment. Moral, sexual, or protected-characteristic-based harassment is expressly prohibited, both within the Company's workspaces and outside of them, if the actions are related to professional activity, including on business trips, at events, training sessions, conferences, or in the online environment.

Autonom supports equal opportunities, including through promoting fair treatment for work of equal value, through access to professional development and leadership roles, through supporting work-life balance, and through eliminating unjustified barriers in the

workplace. Where necessary and reasonable, the Company seeks to provide accommodations and support measures for persons with disabilities or other justified needs.

Inclusion is treated by Autonom not only as an organisational culture objective, but also as an element of governance, retention, performance, and sustainability. The Company may track, within the limits of the law and with due respect for confidentiality, relevant indicators regarding representation, access to opportunities, promotion, retention, and participation in development programmes, in order to assess whether the principles of this Policy produce real effects.

## **9. Prohibition of Modern Slavery, Forced Labour, and Human Trafficking**

Autonom firmly prohibits any form of modern slavery, servitude, forced or compulsory labour, human trafficking, exploitation through coercion, threat, fraud, abuse of vulnerability, or any other practice incompatible with human dignity and freedom of work.

The Company does not accept, in its own activities or in its business relationships, the retention of identity documents, recruitment fees imposed on workers, abusive restriction of freedom of movement, abusively withheld wages, threats, violence, intimidation, psychological coercion, degrading working or housing conditions, deceptive recruitment, or practices through which a person ends up being kept in an abusive or exploitative employment relationship.

Employment relationships must always be based on free and informed consent, legal and transparent contractual documentation, respect for wage rights and working and rest time, as well as the person's real ability to leave the workplace under the conditions of the law. No person shall be induced, directly or indirectly, to perform work under

conditions of fear, abusive dependency, illegitimate pressure, or artificially created lack of alternatives.

Autonom treats with the utmost seriousness any indication of such situations and requires the immediate reporting of any reasonable warning sign, including the indicative signs mentioned in Annex 1 to this Policy.

## **10. Relationship with Suppliers, Subcontractors, and Business Partners**

Autonom expects suppliers, subcontractors, and other business partners to comply with the law, the fundamental rights of workers, and the minimum standards set out in this Policy. The Company seeks to integrate these expectations into contractual documentation, selection and evaluation processes, and commercial relationship monitoring mechanisms.

Relationships with suppliers and partners are managed on a risk-based approach. In prioritising evaluations and control measures, Autonom may take into consideration the sector of activity, the type of services provided, the intensity of workforce use, the use of temporary, seasonal, migrant, or subcontracted labour, the geographical area, the history of non-conformities, the criticality of the supplier to the company's operations, the vulnerability of the workers involved, and other relevant elements.

When it identifies risks or non-conformities, the Company seeks to use the leverage at its disposal to prevent, stop, or mitigate negative impacts, including through:

- introducing mandatory contractual clauses on human rights, workplace conduct, and cooperation in investigations;
- requiring compliance with requirements or codes of conduct applicable to suppliers and subcontractors;
- requesting information, declarations, evidence, and remediation plans;
- exercising documentary or on-site audit rights, when justified;

- monitoring the implementation of corrective measures and setting clear compliance deadlines;
- suspending activities, refusing approval of subcontractors, limiting the expansion of collaboration, or suspending new orders;
- developing the partner's capacity through training, guidance, and clarification of compliance requirements;
- reviewing the Company's own procurement practices when these may generate unreasonable commercial pressures and increase the risk of abuses in the value chain;
- suspending or terminating the commercial relationship and, where appropriate, notifying the competent authorities.

Autonom recognises that leverage is not limited to contractual sanctions. In certain situations, appropriate measures may involve both firm requirements and contractual consequences, as well as support for remediation, enhanced monitoring, or adjustment of the Company's own commercial practices, so that the company does not contribute, directly or indirectly, to the maintenance or aggravation of a negative impact.

## **11. Reporting, Whistleblowing, and Investigations**

Any person within the scope of this Policy has the right and responsibility to report, in good faith, any violation or reasonable suspicion of violation. Reports may concern completed acts, attempts, imminent risks, repetitive behaviours, systemic deficiencies, or warning signs regarding human rights violations in the Company's own activities or in its relationship with third parties.

Reports may be submitted, as appropriate, through one of the following channels:

- Line manager;
- Human Resources Department;
- Whistleblowing platform;
- Competent authorities, under the conditions of the law;

- Emergency service 112, in case of immediate danger to life, physical integrity, or freedom.

Reporting Channel	Contact	Availability
<b>HR Department</b>	hr@autonom.com	Mon–Fri, standard hours
<b>Line Manager</b>	Direct communication (in person or written)	Anytime
<b>Compliance Officer</b>	Direct access or via HR	Mon–Fri, standard hours
<b>Whistleblower Platform</b>	Accessible online / internal site	24/7, anonymous
<b>Emmergencies (imminent danger)</b>	112 – National emergency number	24/7

Autonom ensures that the relevant reporting mechanisms mentioned above are accessible and communicated not only to employees, but also, as appropriate, to candidates, associates, suppliers, subcontractors, external workers, and other relevant stakeholders. The Company encourages the use of these channels and does not permit any form of intimidation, disadvantage, demotion, sanctioning, or other adverse treatment against persons who report in good faith or participate in an investigation. All reports are handled with confidentiality, impartiality, promptness, and respect for the rights of the persons involved. Anonymous reports are handled under the conditions permitted by the mechanism used and the applicable framework. When a person is unsure whether a particular situation falls within the scope of this Policy, they are

encouraged to contact their line manager, Human Resources, or the Compliance function for guidance.

Investigations will be conducted by competent persons free from conflicts of interest. Depending on the complexity of the case, the Company may involve external experts, independent auditors, legal advisors, psychologists, mediators, or other persons with appropriate competencies. For cases involving harassment, whistleblowing, disciplinary proceedings, or other existing special procedures, the dedicated internal documents shall also apply in a complementary manner, including the rules on competence, deadlines, and confidentiality provided therein.

## **12. Remediation and Protection of Affected Persons**

Autonom expressly recognises that an effective human rights compliance framework does not stop at detection, investigation, and sanctioning, but must also include genuine remediation mechanisms.

When a negative impact is confirmed or there are sufficient indications of its occurrence or imminence, the Company will adopt proportionate measures to stop the conduct or practice in question, to protect the affected persons, to reduce the consequences, and to prevent recurrence. Depending on the case, remediation may include correcting an HR decision, removing inequitable treatment, immediate protection measures, psychological or legal counselling or support, reasonable accommodations, payment of owed entitlements, disciplinary measures, imposing corrective plans on a business partner, suspending collaboration, or notifying the competent authorities.

The Company seeks, to the extent possible and reasonable, for the remediation to be appropriate to the nature of the impact and to address both the need to stop the negative effect and the need to restore, repair, or compensate for the effects produced. Where possible, the effectiveness of remediation measures is verified through

documented follow-up, dialogue with affected persons or relevant representatives, and monitoring the implementation of the measures established.

### **13. Monitoring, Measurement, Internal Reporting, and Review**

Autonom continuously monitors the application and effectiveness of this Policy. Its implementation is subject to periodic checks and analyses within the relevant internal structures, including at management, HR, compliance, procurement, and other involved functions level, and the relevant conclusions are documented in accordance with applicable internal rules.

In evaluating the effectiveness of the Policy, the Company may use relevant indicators regarding the typology and number of complaints, duration of investigations, number of confirmed cases, protection and remediation measures adopted, number of training hours, training coverage rate, supplier evaluation results, number of corrective plans, as well as relevant indicators regarding diversity, access to opportunities, promotion, retention, and representation at organisational levels, within the limits permitted by law and with due respect for confidentiality.

Autonom will conduct at least an annual review of this Policy and its manner of implementation, taking into account significant incidents, the results of controls, audits, and investigations, stakeholder feedback, legislative changes, conclusions of materiality exercises, and the adequacy of allocated resources. When necessary, the Company will update the Policy, internal controls, and implementation measures, and will communicate these updates to relevant persons and partners.

The Company's management will set, at least annually, objectives and targets relevant to the indicators mentioned, proportionate to the organisation's risk profile and maturity level. These objectives will be documented and communicated to the responsible functions. Examples of objectives and KPIs that may be used include: percentage of

employees trained annually; number of books read; number of training hours per employee; maximum resolution time for complaints.

#### **14. Sanctions and Consequences of Non-Compliance**

Non-compliance with this Policy constitutes a violation and may result in disciplinary, contractual, organisational, or legal measures, as applicable.

With regard to internal persons, measures may include:

- written warning;
- application of other disciplinary sanctions provided by law and by the Internal Regulations;
- removal from sensitive roles or appropriate organisational measures;
- termination of the contractual relationship, in serious cases and under the conditions of the law.

With regard to suppliers, subcontractors, and other business partners, measures may include requesting a remediation plan, enhanced monitoring, additional audit, temporary suspension of collaboration, non-renewal of contractual relationships, contract termination, recovery of damages where applicable, and notification of the competent authorities.

Reports made in bad faith, in a manifestly abusive or defamatory manner, may result in corresponding measures. A report made in good faith will not be sanctioned merely because the suspicion was not subsequently confirmed.

#### **15. Data Protection, Communication, and Final Provisions**

All personal data processed in the application of this Policy will be managed in accordance with applicable legislation and internal data protection policies. Access to sensitive information will be limited to persons who have a legitimate and authorised need to know.

This Policy will be communicated to all employees and relevant associates and will be integrated into onboarding, training, and internal communication processes. To the extent relevant, the Policy will be brought to the attention of suppliers, subcontractors, and business partners and, where appropriate, will be made publicly available through the channels established by the Company.

The implementation of this Policy will be supported by periodic training, awareness-raising, appropriate controls, and integration into the company's relevant processes. No provision of this Policy limits the rights conferred on persons by law or by other internal policies that provide additional protections.

This Policy enters into force on the date of approval and is reviewed at least annually or whenever legislative, organisational, or risk-related changes occur that warrant its update.

## **Annex 1 – Indicative Signs Regarding Possible Situations of Modern Slavery, Human Trafficking, or Human Rights Violations**

The following examples are indicative and not exhaustive. The presence of a single element does not automatically confirm a violation, but may justify further analysis, escalation to the line manager, HR, or the Compliance Officer, and the application of the mechanisms provided for in this Policy:

### **Indicative signs regarding possible situations of modern slavery and human trafficking:**

- The person does not have control over their own identity or travel documents;
- The person appears to be controlled, monitored, or unusually instructed by someone else;

- Another person constantly responds on their behalf or does not allow them to speak freely;
- The person is transported to and from work under conditions suggesting control or coercion;
- The person is withdrawn, frightened, disoriented, or avoids interaction;
- The person does not appear to be able to freely contact family or friends;
- The person shows signs of physical abuse, exhaustion, malnutrition, or neglect;
- There are indications of abusively withheld wages, imposed debts, threats, restriction of freedom of movement, or inability to actually leave the workplace;
- The actual working or housing conditions differ significantly and suspiciously from those promised during recruitment;
- There are other circumstances which, analysed objectively, may suggest exploitation, coercion, or human trafficking;
- Employment of minors below the legal minimum age or in conditions prohibited by law.

### **Discrimination and equal opportunities:**

- Refusal to hire or promote a person based on gender, age, ethnicity, disability, sexual orientation, religion, marital status, or other protected criteria, in the absence of an objective justification related to the requirements of the position.
- Establishing selection or evaluation criteria which, although apparently neutral, systematically disadvantage a particular group (e.g. physical requirements unnecessary for the role, availability requirements incompatible with family responsibilities, without flexibility).

- Repeated exclusion of employees from training, mentoring, or high-visibility project opportunities, on grounds unrelated to performance or competencies.
- Unjustified pay differences between employees performing work of equal value, correlated with protected criteria.
- Requesting irrelevant personal information during the recruitment process (family plans, pregnancy, marital status, political or religious beliefs).
- Imposing appearance, dress, or behavioural requirements unrelated to the role that disadvantage certain groups.

### **Moral and sexual harassment, and bullying:**

- Repeated, degrading, or offensive comments regarding a person's protected characteristic (physical appearance, accent, ethnic origin, sexual orientation, disability, etc.).
- Jokes, remarks, or "banter" with racist, sexist, homophobic, or xenophobic content, even if the person making them considers them harmless.
- Unwanted sexual advances, inappropriate physical contact, requests for sexual favours, conditioning of professional benefits on personal or sexual relationships.
- Sending messages, images, or materials with sexual, offensive, or intimidating content, through any channel (email, chat, in person).
- Deliberate isolation of a colleague (exclusion from communications, meetings, decisions), public ridicule, systematic undermining of a person's authority or competence.
- Spreading rumours or false information about a colleague with the intention of damaging their reputation or professional standing.

### **Working conditions and health and safety:**

- Systematic imposition of overtime without compensation or without observing legal limits, including through informal pressure.
- Failure to respect the right to breaks and rest (daily, weekly, annual leave).
- Unjustified refusal or delay in providing reasonable accommodations requested by an employee with disabilities.
- Exposing employees to physical or psychosocial risks without adequate protective measures.
- Conditioning access to benefits (leave, flexible schedule) on discriminatory or arbitrary criteria.

### Retaliation and victimisation:

- Sanctioning, demoting, excluding, or unfavourably treating an employee who reported in good faith a suspected policy violation.
- Pressures exerted on an employee to withdraw a complaint or to not cooperate with an investigation.
- Professional or social isolation of an employee as a result of their participation in an internal investigation (as a witness, reporter, or affected person).
- Direct or indirect threats against the employee or their family, related to the reporting of a non-conformity.

**NOTE:** *This annex is indicative and educational in nature. It does not replace the obligation of each employee to use their own judgement and to report any situation which, even if not explicitly listed above, raises reasonable concerns regarding human rights, the dignity, or the safety of a person.*