



**Human Rights and Key Supply Chain commitments  
Policy**

**of**

**Sphera Franchise Group SA**

**and its Subsidiaries**

At Sphera, our core values motivate us to be leaders using our Intelligence, Passion, and Courage (SMART, HEART & COURAGE) and make the world a better place. This translates into maintaining a working environment that respects, supports and promotes human rights for all our employees and suppliers and for the local communities in which we activate, in the three markets where we are present.

## THE BASIC PRINCIPLES OF OUR HUMAN RIGHTS PRACTICES INCLUDE THE FOLLOWING:

- We do not hire workers under the legal age for employment according to Romanian legislation, respectively under 15 years.
- We prohibit corporal punishment or abuse.
- We respect the right of all employees to join or not join a group, to the extent permitted by applicable law and regulations.
- We request compliance with local labor laws in each market in which we operate.
- We promote, protect, and contribute to ensuring equal rights for all people, including minorities, women, and people with disabilities.
- We work with stakeholders to gather data and help guide our human rights efforts.

We have the same expectations regarding ethical, legal, and social responsibility business practices from our suppliers and require them to comply with all industry-specific standards and regulations, in addition to those set forth in our Supplier Code of Conduct.

Key topics include:

- **Schedule and working conditions.** Suppliers are expected to provide employees with safe and healthy working conditions as well as work schedules in accordance with the applicable law.
- **Nondiscrimination.** Suppliers must comply with all laws prohibiting discrimination in employment and occupation on the grounds of race, religion, color, age, disability, genetic information, military or veteran status, sexual orientation, gender, gender identity, and / or expression of gender, citizenship, national origin, or any other status protected by law
- **Exploitation of children.** Suppliers must not use workers under the legal age for employment. Suppliers must not in any way use employees under the age of 15.

- **Forced labour.** No supplier shall perform work or produce goods for Sphera using slave-based labor in any way; threats of violence, corporal punishment, isolation, or other form of physical, sexual, psychological, or verbal harassment or abuse should also not be used as a method of discipline or control.
- **Informing employees.** To the extent required by law, suppliers must establish company-wide policies to implement the standards set out in the Sphera Group Code of Conduct for Suppliers and publish information on those policies for their employees.

## PROMOTING SUPPLIER RESPONSIBILITY

We ask suppliers to conduct audits and inspections to verify compliance with our Code of Conduct. In addition, we reserve the right to carry out unannounced assessments, audits, and unforeseen inspections of suppliers' facilities. Orice încălcări atrag după sine măsuri disciplinare, inclusiv încetarea relației cu furnizorul respectiv pentru încălcări sau cazuri repetate de nerespectare.

## PRESENTATION OF CONCERNS

Anyone, whether employed or not, who has ethical concerns is encouraged to report them safely and anonymously.

\*\*\*