

Corticeira Amorim

Monitoring report on respect for Human Rights 2024

| A. Reference period | |
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| Start date | 01.01.2024 |
| End date | 31.12.2024 |

| B. GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS, Implementing the United Nations “Protect, Respect and Remedy” Framework | | Preventive/Corrective MEASURES |
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| No. | Foundational Principles | |
| 11. | Business enterprises should respect human rights. This means that they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved. | Code of Ethics and Conduct + Human Resources Policy |
| 12. | The responsibility of business enterprises to respect human rights refers to internationally recognised human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. | Code of Ethics and Conduct + Human Resources Policy |
| 13. | The responsibility to respect human rights requires that business enterprises: (a) Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur; | Code of Ethics and Conduct + Human Resources Policy |
| | (b) Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts. | Code of Ethics and Conduct + Human Resources Policy |
| 14. | The responsibility of business enterprises to respect human rights applies to all enterprises regardless of their size, sector, operational context, ownership and structure. Nevertheless, the scale and complexity of the means through which enterprises meet that responsibility may vary according to these factors and with the severity of the enterprise's adverse human rights impacts. | Code of Ethics and Conduct + Human Resources Policy |
| 15. | In order to meet their responsibility to respect human rights, business enterprises should have in place policies and processes appropriate to their size and circumstances, including: (a) A policy commitment to meet their responsibility to respect human rights; | Code of Ethics and Conduct + Human Resources Policy |
| | (b) A human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights | Due Diligence Programme |
| | (c) Processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute. | Code of Ethics and Conduct + Human Resources Policy + Whistleblowing Channel |



| | Human Rights Policy | |
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| 16. | As the basis for embedding their responsibility to respect human rights, business enterprises should express their commitment to meet this responsibility through a statement of policy that: (a) Is approved at the most senior level of the business enterprise; (b) Is informed by relevant internal and/or external expertise; | Code of Ethics and Conduct + Human Resources Policy |
| | (c) Stipulates the enterprise's human rights expectations of personnel, business partners and other parties directly linked to its operations, products or services; | Due Diligence Programme + Compliance Officer + Human Resources/ |
| | (d) Is publicly available and communicated internally and externally to all personnel, business partners and other relevant parties; | Code of Ethics and Conduct + Human Resources Policy + Other publicly available corporate documents |
| | (e) Is reflected in operational policies and procedures necessary to embed it throughout the business enterprise. | Code of Ethics and Conduct + Human Resources Policy + Due Diligence Programme + Procedures Manual + Internal Regulations + Security Rules |

| | Human Rights Due Diligence | |
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| 17. | In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. The process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed. Human rights due diligence: (a) Should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships; (b) Will vary in complexity with the size of the business enterprise, the risk of severe human rights impacts, and the nature and context of its operations; (c) Should be ongoing, recognizing that the human rights risks may change over time as the business enterprise's operations and operating context evolve. | Due Diligence Programme + OHS Audits + ISO Certifications + HR Checks + Whistleblowing Channel |
| 18. | In order to gauge human rights risks, business enterprises should identify and assess any actual or potential adverse human rights impacts with which they may be involved either through their own activities or as a result of their business relationships. This process should: (a) Draw on internal and/or independent external human rights expertise; (b) Involve meaningful consultation with potentially affected groups and other relevant stakeholders, as appropriate to the size of the business enterprise and the nature and context of the operation. | Due Diligence Programme + Compliance Officer + HR Department + Sustainability Management Hygiene and Safety Committees of the Business Units + Whistleblowing Channel |

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| 19. | In order to prevent and mitigate adverse human rights impacts, business enterprises should integrate the findings from their impact assessments across relevant internal functions and processes, and take appropriate action. (a) Effective integration requires that: (i) Responsibility for addressing such impacts is assigned to the appropriate level and function within the business enterprise; (ii) Internal decision-making, budget allocations and oversight processes enable effective responses to such impacts. | HR Department + Business Units' Management |
| | (b) Appropriate action will vary according to: (i) Whether the business enterprise causes or contributes to an adverse impact, or whether it is involved solely because the impact is directly linked to its operations, products or services by a business relationship; (ii) The extent of its leverage in addressing the adverse impact. | Business Units' Management |
| 20. | In order to verify whether adverse human rights impacts are being addressed, business enterprises should track the effectiveness of their response. Tracking should: (a) Be based on appropriate qualitative and quantitative indicators; | Due Diligence Programme + Sustainability Reporting + OHS Audits + ISO Certifications |
| | (b) Draw on feedback from both internal and external sources, including affected stakeholders. | Hygiene and Safety Committees + Whistleblowing Channel |

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| | Remediation | |
| 22. | Where business enterprises identify that they have caused or contributed to adverse impacts, they should provide for or cooperate in their remediation through legitimate processes. | Code of Ethics and Conduct + Human Resources Policy |

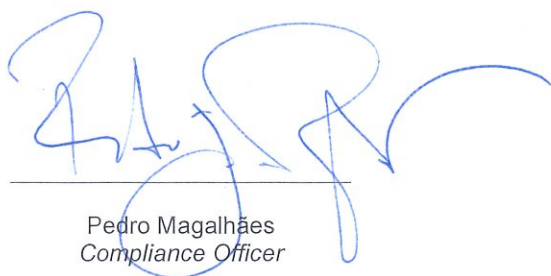
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| | Issues of context | |
| 23. | In all contexts, business enterprises should: (a) Comply with all applicable laws and respect internationally recognised human rights, wherever they operate; | Code of Ethics and Conduct + Human Resources Policy |
| | (b) Seek ways to honour the principles of internationally recognised human rights when faced with conflicting requirements; | Code of Ethics and Conduct + Human Resources Policy |
| | (c) Treat the risk of causing or contributing to gross human rights abuses as a legal compliance issue wherever they operate. | Code of Ethics and Conduct + Human Resources Policy |
| 24. | Where it is necessary to prioritize actions to address actual and potential adverse human rights impacts, business enterprises should first seek to prevent and mitigate those that are most severe or where delayed response would make them irremediable. | Business Units' Management |

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| | Operational principles | |
| 29. | Business enterprises must provide effective and accessible means and channels for contact and complaints, so that situations affecting human and labour rights can be effectively informed and dealt with. Such mechanisms complement, but do not replace, other appropriate means of collective bargaining, challenge or appeal. | Code of Ethics and Conduct + Hygiene and Safety Committees of the Business Units + Whistleblowing Channel |
| 30. | Industry, multi-stakeholder and other collaborative initiatives that are based on respect for human rights-related standards should ensure that effective grievance mechanisms are available. | Not applicable |

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| 31. | Effective and accessible means and channels of contact and complaint should allow for a substantial and fair assessment with a view to effective protection and remediation, through a genuine hearing and timely action. They must also offer the potential for analysis and registration for preventive purposes in future procedures. The mechanisms provided should make it possible to assess how the business enterprise ensures that everyone has access to and is aware of the complaint mechanisms and they should validate or improve the effectiveness. | Code of Ethics and Conduct + Human Resources Policy + Monitoring Programme + Whistleblowing Channel |
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C. Additional information

Following the provisions of Law no. 93/2021 of 20 December, Corticeira Amorim has strengthened its compliance with the obligations laid down therein by implementing a system for receiving and tracking internal complaints, by means of a computer platform that can be extended to all Group companies, which covers human rights issues set out in the Code of Business Ethics and Professional Conduct and in Corticeira Amorim's Policies.



Pedro Magalhães
Compliance Officer