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COMPANY POLICY SOCIAL RESPONSIBILITY, SAFETY, ANTI-DISCRIMINATION

For GAV, corporate social responsibility is reflected in its commitment to pursuing a sustainable economic growth model that respects human rights, protects the rights and dignity of workers and safeguards the environment. GAV strives to provide its employees with safe working conditions, to treat them ethically and with dignity, respect and loyalty, and in a responsible and efficient manner from an environmental point of view, in full compliance with all applicable laws and regulations.

WORKING CONDITIONS

Human rights

GAV actively seeks to respect and promote universal human rights as stated in the Universal Declaration of Human Rights of the United Nations, categorically avoiding being complicit in human rights violations of any kind in an ongoing commitment to ensuring respect for personal dignity, privacy and the the rights of each individual.

Forced labour

GAV agrees not to use any form of forced labour, debt bondage, slavery, human trafficking or forced labour of prisoners. Employees and workers are free to leave or terminate their employment after a reasonable period of notice. GAV also ensures that the employment relationship between the employee and the company is chosen freely and is free from threats.

Child labour

GAV does not employ or use child labour (under 15 years old). In any case, employees under the age of 18 do not perform work having a higher than average risk to health, safety or welfare.

Working hours

Working hours, including overtime, rest periods, holidays, maternity and paternity leave are in compliance with applicable laws and regulations (as provided for by the National Labour Collective Agreement for the Metalworking Industry).

Humane treatment

GAV is committed to ensuring that no harsh or inhumane treatment towards employees is implemented, and that employees are not subjected to or threatened with sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse.

Non-discrimination

GAV does not implement any form of discrimination in hiring, pay, promotions, awards, access to training, termination or retirement based on race, skin colour, ethnicity or national origin, age, gender, sexual orientation, identity and expression of any kind, for any disability,







pregnancy, political affiliation, membership in a trade union, protected genetic information, or marital status.

Freedom of association

In accordance with current law, GAV respects the right of all workers to form or join a trade union of their choice, to be represented in collective bargaining and participate in demonstrations and peaceful assemblies, or to refrain from such forms of association and participation. The workers are free to openly communicate and express their views and concerns to management regarding working conditions and management practices, even anonymously, without fear of retaliation, intimidation or harassment.

HEALTH AND SAFETY

Regarding the Policy for Safety and Health of Workers see paragraph 3 of the Occupational Safety and Health Management System Manual.

ENVIRONMENTAL RESPONSIBILITY

Authorisations and environmental reporting

GAV maintains and keeps up to date all necessary environmental permits, approvals and registrations, observing the operating and reporting requirements.

Prevention of pollution and conservation of resources

The use of resources and the generation of waste of any kind, including the waste of resources such as water and energy, are reduced or eliminated at the origin, through maintenance and inspections of the systems, replacement, conservation, recycling and reuse of materials. It is in the interest of the company to implement and enforce valid measures to prevent pollution and to minimise the production of solid waste, waste water and air emissions.

Chemical and hazardous substances

Chemicals and other materials that present a risk if released into the environment are preventively identified and managed in order to ensure their safe handling, storage, use, recycling or reuse or disposal. For all hazardous substances safety data sheets containing all necessary and relevant safety information are available in the pertinent production departments.

ETHICAL PRINCIPLES

Business integrity

GAV is committed to the highest standards of integrity. Corruption, extortion and embezzlement are strictly prohibited.

Competition

GAV is committed to conducting its activities in line with the principles of fair competition and in compliance with all applicable anti-trust laws.







Identity protection and prohibition of retaliation

GAV is committed to providing its employees with the means to report suspected irregularities or potential illegal activities in the workplace without fear of retaliation. Such reports are considered to be confidential and treated as such. If necessary, GAV will undertake corrective actions.

Responsible mineral sourcing

GAV is committed in a reasonable manner to making sure that its products do not contain metals extracted from minerals or their derivatives from areas in conflict, their proceeds going directly or indirectly to finance or benefit armed groups.

Privacy and intellectual property

GAV is committed to protecting and properly using confidential information and to ensuring that privacy and intellectual property rights of anyone with whom GAV does business (including suppliers, customers, consumers and employees) are protected.