

SAS HUMAN RIGHTS POLICY

October 2025

Contents

1. OUR COMMITMENT	2
2. SCOPE AND STANDARDS OF REPORTING.....	3
3. GOVERNANCE.....	4
4. DEFINITIONS.....	4
5. Policy Standards.....	5
5.1. Non-discrimination, Equal opportunities, and No harassment.....	5
5.2. Modern Slavery and Forced Labour.....	5
5.3. Child Labour	5
5.4. Health and Safety.....	6
5.5. Freedom of Association.....	6
5.6. Working Hours and Wages & Benefits	6
5.7. Anti-corruption	6
6. TRAINING.....	7
7. MANAGING RISK AND DUE DILIGENCE.....	7
8. GRIEVENCE AND REMEDY	8
9. REVIEWING EFFECTIVENESS	9
10. APPROVAL.....	9
Review History	Error! Bookmark not defined.

1. OUR COMMITMENT

We are committed to respecting and safeguarding the human rights of those who are directly or indirectly impacted by SAS International Group (SAS Group). We understand and recognise that our business success is closely interconnected with the global society which depends, for its wellbeing, on a healthy and productive environment. We continuously work to better understand the consequences of our actions and impacts.

Our people are our greatest asset, and we therefore strive to attract talent, provide continuous development opportunities, recognise performance, ensure a safe working environment, and promote employee health and wellbeing. We also ensure we make meaningful and lasting improvements to employment practices and workplace conditions with our value chain both up- and downstream, while minimising our environmental impact. Finally, we place the highest importance on customer safety, welfare, and respect, from their enjoyment of SAS Group products or interactions with the company.

This Human Rights Policy (the “Policy”) details the procedures we have in place to protect and uphold human rights wherever we operate. This includes the various mechanisms we use to identify and address any instances of potential infringement that may arise in connection with SAS Group’s operations and activities.

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We are committed to, and will work with, our Business Associates towards developing work environments in line with human rights principles set out in The UN Guiding Principles on Business and Human Rights, which include but are not limited to:

- The International Bill of Human Rights
- The Universal Declaration of Human Rights
- The International Labour Organisation's (ILO) Core Conventions
- The ILO's Declaration on Fundamental Principles and Rights at Work
- The ILO Conventions on Labour Standards on Working Hours

We fully respect the principles of the UN Global Compact and its ten responsible business principles. We are also guided by the eight International Labour Organization (ILO) Convention areas as follows:

1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87).
2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98).
3. Forced Labour Convention, 1930 (No. 29).
4. Abolition of Forced Labour Convention, 1957 (No. 105).
5. Minimum Age Convention, 1973 (No. 138).
6. Worst Forms of Child Labour Convention, 1999 (No. 182).
7. Equal Remuneration Convention, 1951 (No. 100).
8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111).

SAS Group is also guided by both the UK Human Rights Act 1998 and European Convention on Human Rights (ECHR).

The Policy is guided by the Fundamental Conventions of the International Labor Organization and the United Nations Guiding Principles on Business and Human Rights, as well as the International Bill of Human Rights. Where national law and these international human rights standards differ, we expect that the higher standard is followed; where they are in conflict, we expect that internationally recognised human rights are respected to the greatest extent possible. We recognise the importance of collaboration in driving long-lasting positive change. We therefore work with Business Associates, civil society, governments, and other businesses to inform our approach, share key insights, help address root causes of human rights impacts and, together, work to achieve positive systemic change.

This Policy sets out SAS Group's commitment and aspirations to respect and safeguard the human rights of our extended global community including our people, stakeholders in our supply chain, our communities, and customers. It also sets out the procedures we have in place to support and protect human rights. However, we remain vigilant, informed, and regularly review new forms of best practice to be included in this Policy..

2. SCOPE AND STANDARDS OF REPORTING

The scope of this Policy covers SAS Group and sets the expectations for our people, Business Associates, communities, potentially affected groups, and other relevant stakeholders. This policy sets out the human rights standards that we strive to apply to our operations, as well as the mechanisms for remedy. The guidelines and approach outlined in this Policy clarify the Human Rights process expectations, the aspirations as referred to in the SAS Group's Supplier Code of Conduct, and the engagement we wish to develop with our Business Associates via our Human Rights Due Diligence approach.

It is SAS Group's aspiration that, along with our Business Associates, we are able work in strong and supportive partnerships to meet with all applicable laws and the Human Rights standards included in this Policy.

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3. GOVERNANCE

Overall approval and responsibility for this Policy resides with SAS Group's Chief Executive Officer who is an Executive Director on the board of SAS Group.

The implementation of human and labour rights is overseen by SAS Group Human Resources Director and Chief Finance Officer, who have operational responsibilities for human and labour rights, and report into the CEO and the board.

4. DEFINITIONS

"Human Rights" are defined as all rights set out in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the Core Conventions of the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

"Our people" is defined as people directly employed by SAS Group either permanently, for a fixed term, engaged as a contractor, agency work or on a freelance basis.

"Supply chain" is defined as local and international organisations both up- and downstream which are involved in the production of SAS Group goods at all stages of manufacture, raw material processing and production.

All references to "operations" include SAS Group's wholly or partially owned entities.

Any reference to "communities" applies to those individuals and communities who are either directly or indirectly impacted by their relationship with SAS Group or its extended supply chain.

"Business Associates" refers to any individual, entity, business, company, partnership, or group associated with SAS Group including, without limitation, any such individual, entity, business, company, partnership, or group supplying products, goods, raw materials, components, services, real estate or anything else, directly or indirectly, to any member of the SAS Group or otherwise working directly or indirectly with or on behalf of any member of the SAS Group. This also includes any person (an "Indirect Supplier") providing products, goods, raw materials, components, services, or anything else to (i) a direct supplier of SAS Group or any other member of the SAS Group or (ii) any other Indirect Supplier.

SAS Group's Business Associates include, without limitation, the following:

- finished goods vendors
- raw material and/or component suppliers
- people or entities who carry out any processing on any goods directly or indirectly supplied to SAS Group
- all production sites of any Business Associate
- non-stock vendors
- construction contractors (and their construction sites)
- franchisees
- licensees
- joint-venture partners
- consultants
- contractors

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- wholesale customers
- service providers
- agents
- landlords
- any subcontractor of the above

5. Policy Standards

SAS Group is committed to respecting all internationally recognised human rights standards. Our approach focuses on the human rights issues that we consider most relevant to our business and is informed by the high-level risk assessment under the Cradle-to-Cradle certification. These issues are:

5.1. Non-discrimination, Equal opportunities, No harassment and Abuse

SAS Group is fully committed to the elimination of unlawful and unfair discrimination and values the difference that a diverse workforce brings to the organisation.

We provide equality of opportunity and treatment for the purposes of eliminating discrimination based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation or any other irrelevant factor. We will build a culture that values meritocracy, openness, fairness and transparency.

For more information, see our Equal Opportunities, Diversity, and Inclusion Policy.

5.2. Modern Slavery and Forced Labour

SAS Group is committed to the abolishment of modern slavery and any type of involuntary or forced labour, including indentured, bonded, slave or human trafficked labour and endeavours to ensure business practices and supply chains are free from both. We are committed to acting ethically and with integrity in all our business dealings and relationships.

We expect all persons working for us or on our behalf in any capacity to uphold these principles, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

More information on our approach to modern slavery can be found in our Modern Slavery Statement and Anti-Slavery Policy these are available via the Company information management system and Company website.

5.3. Child Labour

SAS Group prohibits any form of child labour and expects our business partners to do the same and comply with local laws regarding minimum age of employees including:

- the minimum age for workers must not be less than the age of completion of compulsory schooling.
- compliance with all legal requirements for the work of authorised young workers; particularly those relating to hours of work, wages, and safe working conditions, and
- the protection of young workers from performing any work that it is likely to be hazardous or to interfere with their education or that may be harmful to their health, physical, mental, social, spiritual, or moral development.

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5.4. Health and Safety

SAS Group is committed to managing our operations in such a way that complies with or exceeds all relevant environmental, health, safety and quality (EHSQ) standards, legislation, and other requirements that apply to our activities, products and services.

Our EHSQ standards include the below requirements, but not limited to;

- Access to water, sanitation, and hygiene
- Emergency protocols (including fire)
- Electrical and other related risks
- Appropriate building construction
- Hazardous materials handling procedures

We expect our business partners to provide safe conditions and should establish and follow a clear set of procedures for managing EHSQ.

For further information on our approach to EHSQ, see our Integrated Environmental, Health, Safety and Quality (EHSQ) policy.

5.5. Freedom of Association

SAS Group recognises the importance of open communication and direct engagement between workers and management. We are committed to respecting the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference, or reprisal; and to recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing. We expect our business partners to do the same and respect any legal right of workers to bargain collectively.

5.6. Working Hours and Wages & Benefits

SAS Group is committed to respecting workers and shall not require workers to work more than the legal requirement and provide the required rest days. We expect the same of our business partners and to monitor the working hours of their employees.

SAS Group is a Living Wage employer (UK) and as a result, we require all of our business partners to abide by the rate set by the Living Wage organisation, which is reviewed annually. We expect business partners to pay their workers at least the minimum required by local law and provide all legally mandated benefits. We expect that in addition to payment for regular hours of work, workers must be paid for overtime hours at such premium rate as is legally required.

5.7. Anti-corruption

SAS Group takes a zero-tolerance approach to bribery and corruption and is committed to acting lawfully, professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption. We expect all persons working for us or our business partners to adhere to this.

More information on our approach to bribery and corruption can be found in our Anti-Bribery and Corruption Policy.

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6. TRAINING

SAS Group provides training to employees on human rights and supports them in their compliance with this Policy. This will entail ensuring that all our people are aware of the Policy and its requirements.

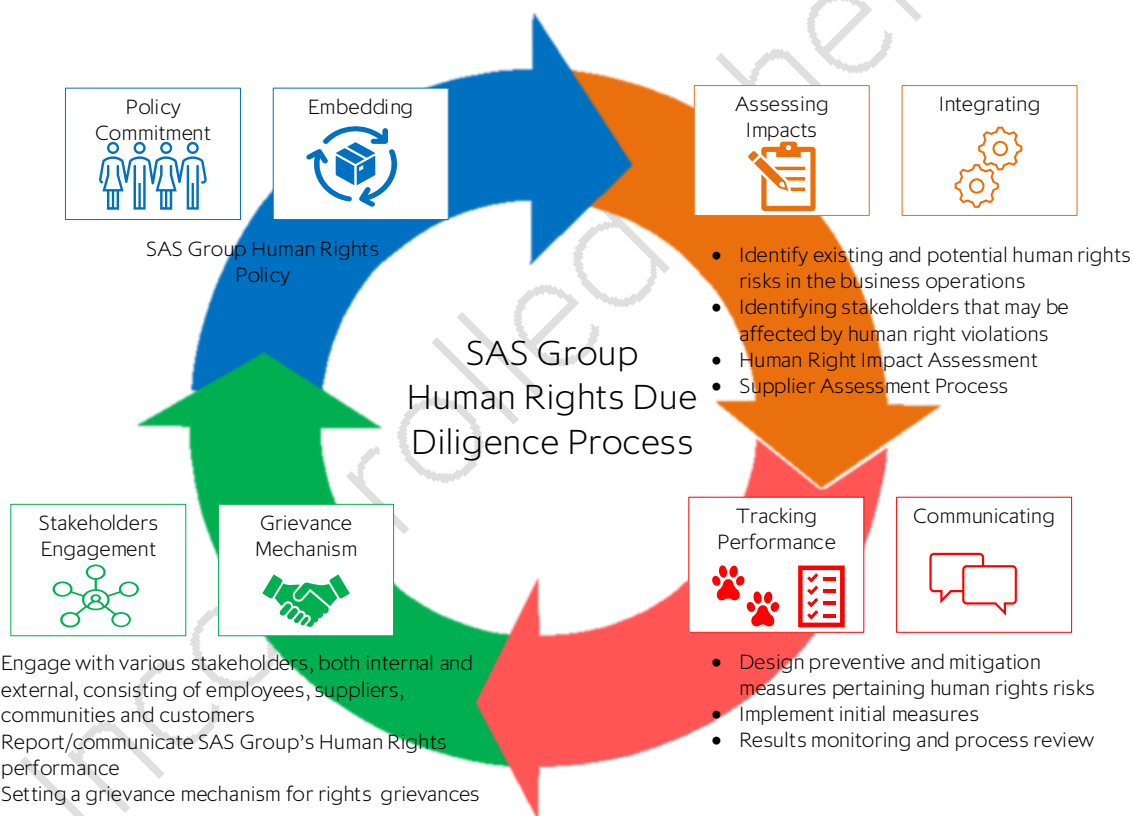
SAS Group has undertaken human rights due diligence training for employees involved in the management of human rights risks.

Basic online training on modern slavery is mandatory for all of our employees.

7. MANAGING RISK AND DUE DILIGENCE

SAS Group and its operations, where reasonably practical, will take necessary steps to identify and manage risks to the human rights of its stakeholder groups, including its people, supply chain workers, communities, and customers where SAS Group operates by establishing and embedding relevant policies and tools.

SAS Group operates a Due Diligence Process in line with the UN Guiding Principles for Business and Human Rights as illustrated below:



8. GRIEVANCE AND REMEDY

SAS Group is committed to investigating, addressing, and responding to the concerns of our people, business associates and other stakeholders and to taking corrective action or other appropriate responses to any violation.

In line with our Whistleblowing Policy and international standards such as the UNGPs, we expect our people, Business Partners, as well as those working under our supervision, members of the communities we operate in or source from, as well as any other relevant stakeholders, to report any suspected or actual human rights violations or risks through our dedicated reporting channels. Human rights violations include, but are not limited to, modern slavery, forced labour, child labour and human trafficking.

SAS Group is committed to promoting a culture of transparency and accountability that encourages incidents of suspected wrongdoings to be reported and addressed as soon as possible.

SAS Group will not permit, any retaliation against anyone raising a complaint and will respect the rights of any other stakeholders raising human rights related concerns including human rights defenders. SAS Group expect all our Business Associates to respect the rights of human rights defenders.

There are two primary channels to raise human rights concerns:

1. In accordance with our Whistleblowing Policy and Grievance Policy, our people can ask questions or report potential violations to their line manager, the Designated Officers, or the highest-ranking person or the Chairman of the Board.
2. Through our dedicated hotline, our people, business associates, and other stakeholders are encouraged to use the dedicated hotline to report any concerns. The reporting process is straightforward and available in multiple languages to ensure accessibility. Should any difficulties arise during the reporting process, a representative from the external NAVEX team will respond within 24 hours to assist.

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SAS Group supports the right of workers in our supply chain to freely join a trade union and have access to a suitable grievance mechanism that is clearly communicated and understood by and applied fairly to their employees. Through the Supplier Code of Conduct, we work with our business associates to support them in ensuring their grievance mechanisms are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue. SAS Group expects that our Business Associates prohibit any retaliation against workers and other stakeholders for raising human rights related concerns.

SAS Group are committed to respecting the human rights of the people in the local communities in which we operate, such as those surrounding our factories, offices, warehouses, and distribution centres. Our Local Stakeholder Engagement Policy sets out the procedure to be followed when a local stakeholder reports an issue or risk that has arisen associated with SAS Group operations or activities. Any grievances made are logged and processed, with outcomes formally recorded.

Customers can report any issue regarding product or customer experience via letter, phone, email, social media, or website form to our UK headquarters in Reading, UK. Any grievances made are logged and processed, with outcomes formally recorded.

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9. REVIEWING EFFECTIVENESS

SAS Group's Human Resources Director and Chief Finance Officer have the overall responsibility for ensuring this policy complies with SAS Group's legal and ethical obligations, and that those under its control comply with it.

SAS International board has responsibility for overseeing the effectiveness of both Internal Control systems and Enterprise Risk Management, or ERM, and senior management is responsible for their effective design and implementation. A review of human rights risks, processes and procedures has been integrated within the annual review responsibilities of the board.

SAS Group's offices, departments and teams will be responsible for implementation, monitoring and reporting across our business and our 'Business Associates' activities in relation Human Rights.

SAS Group will regularly seek stakeholder input on the application of our policies through multi-stakeholder dialogue e.g., with external independent experts i.e., Responsible Steel or/and other organisations.

This policy will be reviewed annually and updated as required.

10. APPROVAL

This policy was approved by the Board of Directors and is issued on a version-controlled basis. The current version of this document is available to all members of staff via the company SharePoint and is published as required.

For and on behalf of SAS International.



Alyn Gammon

CEO, SAS International

Change History Record

ISSUE:	DESCRIPTION OF CHANGE:	DATE:	APPROVAL:
1	New Policy	07/06/2022	G. D
1.3	Updated SAS policies	13/01/2023	G. D
A	Update version control and signatory	01/08/2023	A. G
B	Update version control and signatory	01/10/2025	A. G
C		25/11/2025	B. G

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Human Rights Policy

8 Training Needs

Function	Original Training Needs Analysis	Training Needs from the New Revision
All Employees	A	A
Senior Team	N/A	N/A
Purchasing	N/A	N/A
Finance	N/A	N/A
Design & Engineering	N/A	N/A
Planning	N/A	N/A
Manufacturing/ Shop Floor	N/A	N/A
Logistics	N/A	N/A
SOP	N/A	N/A
Inventory Management	N/A	N/A
Estimating	N/A	N/A
Quality	N/A	N/A
Costing	N/A	N/A
IT	N/A	N/A

Training Needs

A – Read and understand new or revised document

B – Off-job training delivery (+A)

C – On-job training delivery (+A)

D – On-job training delivery with competency assessed (+A)

NOTE: if using B, C or D the document must still be read and understood.

Author	Owner