



DUE DILIGENCE HUMAN RIGHTS POLICY

June 2025



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HORSE TECHNOLOGIES IS COMMITTED TO RESPECTING THE HUMAN RIGHTS RECOGNIZED IN INTERNATIONAL FRAMEWORKS, A POSITION THAT IS REFLECTED IN HORSE'S CODE OF BUSINESS ETHICS AND ESG POLICY, WHICH CONTAINS A SET OF RULES OF CONDUCT THAT MUST BE COMPLIED WITH BY EMPLOYEES, MANAGERS AND DIRECTORS, AND THE PRINCIPLES THAT SHOULD GOVERN HORSE'S BUSINESS ACTIVITIES.

Scope of application

This policy applies to all members of the Management Committee - HLT, members of the management team and employees of HORSE Technologies Division and its subsidiaries.

HORSE also expects respect for this Policy by its business partners with whom the company has a business arrangement related to the company's operations, products or services, or to whom the company provides services. For this reason, we have developed a ESG standards for suppliers of goods and services and partners.

The management of human rights impacts is integrated into the management of HORSE's other impacts.

Due diligence

HORSE applies a preventive, continuous and risk-based due diligence approach to identify, assess, prioritize, prevent and mitigate actual and potential adverse human rights impacts throughout its value chain following the OECD Due Diligence Guidance for Responsible Business

Horse's goal is to fully integrate due diligence into all decision-making processes, including supplier relations, product design and international operations.

Our human rights commitments are embodied in due diligence as an ongoing process we undertake at HORSE to identify, prevent, mitigate and account for adverse human rights impacts that the company may cause or contribute to through its own activities, or that may be directly related to the company's products, operations or services.

Identify & assess adverse impacts- HORSE identifies and assesses the actual and potential human rights impacts it may cause or contribute to, arising from its own activities, those of its subsidiaries and those of its business partners when they are related to HORSE's chain of activities.

The identification of impacts uses both internal information from all HORSE's activities and subsidiaries, as well as external sources to determine specific impacts by country or product. The specific groups covered and analysed during the impact identification process include HORSE's employees, local communities and indigenous people, migrant workers, and third-party employees such as external workers and subcontractors.

Once the inherent impacts have been identified, they are evaluated according to their severity and probability, prioritizing severity over probability. When it is not possible to simultaneously carry out all impact prevention, mitigation and elimination measures Horse prioritizes the identified impacts according to their severity and probability.



Controls to cease, prevent or mitigate adverse impacts- HORSE then identifies and evaluates, both for its activities and those of its subsidiaries and business partners, the existing prevention and mitigation measures for each potential impact. This assessment makes it possible to determine whether adequate measures are in place or whether additional prevention and mitigation plans need to be developed and implemented.

Monitoring implementation and results- HORSE carries out monitoring activities for the supervision of the due diligence model. These activities are aimed, first, at identifying new potential or actual human rights impacts and, second, at assessing the effectiveness of the prevention and mitigation measures adopted.

Communicate how impacts are addressed- HORSE publicly reports information on due diligence processes regarding impacts, and actions taken to prevent, mitigate or remediate human right risks.

Remediation of adverse effects- HORSE is committed to remedying any actual impacts it has caused, either alone or jointly, seeking to restore the affected persons. Such remediation will be carried out in accordance with the company's involvement in the adverse impact. Remedies may consist of financial or non-financial compensation.

Additionally, HORSE maintains constructive collaboration with stakeholders in the impact identification and assessment, in the development of preventive action plans and corrective action plans and, where appropriate, for remediation of actual adverse effects.

Human Rights Commitments

HORSE is committed to respecting and promoting human rights that may be directly or indirectly impacted by its operations.

Human Rights Related to Working Conditions

Child Labour: HORSE rejects all forms of child labour not employing anyone under the obligation to attend school or under the age of 15 years for light work or under the age of 18 years for work overnight or that can be dangerous or impact health.

It must be ensured that all ILO (International Labour Organization) conventions regarding minimum working age are complied within activities throughout the value chain.

Forced Labour: HORSE rejects any form of forced labour, modern slavery, restriction of freedom of movement, excessive overtime, hiring employees against their will or under threat, including the use of violence or intimidation, withholding of wages, forced debt, abusive working and living conditions, retention of identity documents, or threats of reporting to the authorities.

Any employee must be free to terminate the employment relationship at any time, subject to the stipulated notice period, without incurring penalties or wage deductions.

If disciplinary measures are applied, they will be free from any form of violence, physical punishment, humiliation, and treatment contrary to human dignity.

Human Trafficking: HORSE strictly prohibits all forms of human trafficking. The company is committed to identifying, preventing, and addressing any risks of human trafficking within its operations and supply chain. HORSE expects all employees, suppliers, and business partners to uphold this commitment and to act in accordance with international standards and applicable laws aimed at eradicating human trafficking.



Health and Safety- HORSE ensures that their employees and subcontractors are not exposed to severe occupational health and safety hazards and is committed to implement effective health and safety measures that are tailored to the job and based on prevention. HORSE seeks to prevent and avoid workplace accidents at all its workplaces. To this end, the company implements action plans, protective measures, and training, as well as commitments applicable to all employees and subcontractors. It is committed to monitor all measures implemented.

HORSE provides employees with adequate ventilation, light and temperature levels, and acceptable levels of noise and dust/air pollution, as well as with resting and eating areas, toilet facilities, dining areas with potable water and access to first-aid supplies.

Non-discrimination and equality commitment- HORSE rejects any type of discrimination based on race, ethnicity or caste, religion, ideology, age, nationality, sexual orientation, gender, marital or family status, social origin, disability, opinion, trade union activities or for any other reason. The company strongly rejects any behaviour that creates an offensive, hostile or intimidating work environment, as well as all forms of harassment.

The company is committed to equal treatment and equal opportunities in any working aspect such as recruitment, promotion, assessment, training, wages, assignment of duties, disciplinary measures, dismissal or retirement.

In the case of hiring migrant workers, HORSE will ensure decent working conditions and decent accommodation conditions.

Freedom of association and collective bargaining- HORSE recognizes the right of workers' freedom of association, collective bargaining and social dialogue based on the laws of each country without any form of retaliation or discrimination.

In countries where local law sets restrictions on the right to freedom of association and collective bargaining, employees may hold regular meetings to freely discuss issues related to working conditions.

Fair and equal wages and benefits- HORSE seeks to provide employees with a living wage, that is, a salary equal to or higher than the legal minimum wage, guaranteeing a fair pay which enable employees to cover their basic needs. HORSE is committed to ensuring that all employees receive equal pay for work of equal value, avoiding any sort of discrimination based on gender or any other status. The company regularly reviews its compensation practices to identify and address any unjustified pay gaps and to promote transparency and equity in remuneration.

Working Hours- HORSE is committed to avoid a working week of more than 48 hours per week, to guarantee one day off per week and paid annual vacation period. Additionally, Horse ensures working hours based on voluntary basis, do not exceed 12 hours per week and are compensated in accordance with local laws.

HORSE respect sick and parental leave and promote work-life balance and the right of disconnect.

Human Rights Related to Local Communities

Rights of local communities- HORSE is committed to protect the rights of the local communities where it operates. These commitments translate into respecting their right to access basic services such as water, energy, food, freedom of movement, housing, property, land use, health, and education. Special attention is given to the rights of native, aboriginal, and indigenous peoples. In addition, HORSE takes these issues into account when acquiring land where a factory is to be built.



HORSE ensures the use of private security forces is in full compliance with all applicable laws and regulations and does not abuse its power or violates human rights.

Human Rights related to Client and End - User

Quality of product and services- HORSE is committed to implement and comply with the highest quality standards in relation to product health and safety, including environmental impacts. The company is dedicated to ensuring that all products and services are safe for customers and do not pose any health risks throughout their lifecycle. HORSE aims to proactively identify and mitigate any potential negative health and safety impacts associated with its offerings.

Human rights related to healthy environment

Healthy environment- HORSE is committed to implement measures to minimise its impact on the environment, including the emission of air pollutants, the deterioration of surface water quality and water pollution, the generation of hazardous waste and the alteration of landscapes and habitats.

Grievance mechanisms

Horse has enabled a whistleblowing channel applicable to all group subsidiaries where conduct or situations contrary to the Group's internal policies and procedures can be reported.

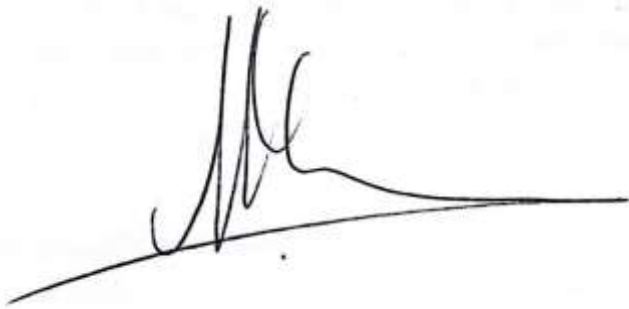
The channel is available to employees, officers, consultants, shareholders, members of the administrative, management and supervisory bodies, volunteers, trainees (paid or unpaid), candidates for employment if the information was obtained during the selection process, temporary workers and agency personnel, contractors and their subcontractors, and, in the case of legal entities, members of their administrative, management and supervisory bodies, as well as their employees.

References

This Human Rights Policy establishes the principles of action that inspire Horse's commitment to respect human rights in accordance with the following instruments on human rights and fundamental freedoms:

- The Universal Declaration of Human Rights of 1948 and the principles laid down within the framework of the Declaration of the International Labour (ILO) of 1998, relating to the basic principles and rights at work, and ILO Convention N° 155 on Occupational Safety and Health;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- Convention on the Rights of the Child;
- Basic and fundamental conventions of the International Labor Organization:
 - Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87);
 - Right to Organize and Collective Bargaining Convention, 1949 (No. 98);
 - Forced Labor Convention, 1930 (No. 29) and its Protocol of 2014;
 - Abolition of Forced Labor Convention, 1957 (No. 105);
 - Minimum Age Convention, 1973 (No. 138);
 - Worst Forms of Child Labor Convention, 1999 (No. 182);

- Equal Remuneration Convention, 1951 (No. 100);
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111).
- The UN Global Compact
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- The OECD guidelines for Multinational Enterprises adopted on 27 June 2000, updated in 2011 and 2023;

A handwritten signature in black ink, appearing to read "Patrice Haettel", written over a horizontal line.

Patrice Haettel

CEO

HORSE TECHNOLOGIES DIVISION

