




Human Rights and Fair Labor Policy

Ashtrom Group



 Ashtrom Group strives to uphold human rights and fair labor practices across its value chain. This policy reaffirms our commitment to fair, honest, and ethical business practices, aligned with recognized international principles. It is an integral part of our broader aspiration to advance Ashtrom Group's Environmental, Social, and Governance (ESG) strategy. This policy reflects our commitment to maintain a safe, healthy, and ethical business environment, while promoting a fair and equitable workplace for all stakeholders across our operations and supply chain.

Applicability

This policy applies to all activities of Ashtrom Group, including its subsidiaries, their employees, and contractor workers. It extends across the entire supply chain of Ashtrom Group, encompassing outsourced workers, business partners, contractors, suppliers, and other external entities responsible for employment. Additionally, it covers all Group-affiliated entities that provide services within the scope of the Group's operations in the countries where it operates.


Fundamental Principles

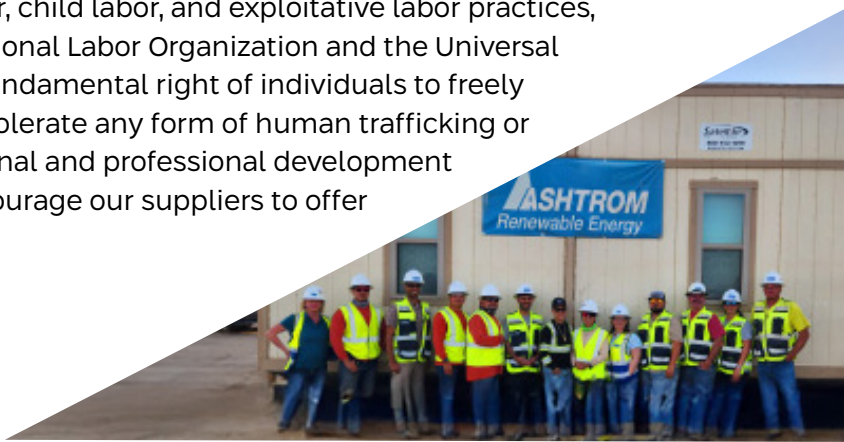
By adhering to this policy, Ashtrom Group reaffirms its commitment to respecting and protecting the fundamental rights of all individuals to the fullest extent possible. The Group requires all employees and stakeholders to be aware of and uphold the commitments outlined in this policy.

Upholding Human Rights

We believe in the inherent dignity and rights of all individuals, as outlined in the [Universal Declaration of Human Rights](#) and key international frameworks, including the International Labor Organization (ILO) [Declaration on Fundamental Principles and Rights at Work](#), and the principles of the [United Nations Global Compact](#). Our commitment to human rights is embedded in all aspects of our operations, with a strong emphasis on non-discrimination and equal treatment for all.

Fair Labor Practices and Employment Conditions

 We strive to ensure fair employment conditions for our employees, including equitable wages, reasonable working hours, and a safe work environment. We also encourage our suppliers to uphold these standards for their employees and subcontractors. We firmly oppose "modern slavery", forced labor, child labor, and exploitative labor practices, in alignment with the principles of the International Labor Organization and the Universal Declaration of Human Rights. We support the fundamental right of individuals to freely choose their place of employment and do not tolerate any form of human trafficking or illegal exploitation. We act to support the personal and professional development of our employees as much as possible and encourage our suppliers to offer similar opportunities to their workforce.



Working to Prevent Discrimination

We prohibit discrimination of any kind, including but not limited to race, color, sex, religion, beliefs, age, disability, sexual orientation, political opinion, or personal, economic, or social status.

Workforce and Work Environment Health and Safety

We strive to maintain high standards to ensure a safe and healthy work environment. We expect our suppliers to do the same by providing a workplace that complies with all applicable health and safety regulations and standards in their area of operation. This includes offering proper training, protective equipment, and necessary accommodations for employees and subcontractors. Additionally, we may request our suppliers to report on the measures they have implemented to safeguard the occupational health and safety of their workforce.

Fostering a Respectful and Inclusive Organizational Culture

We strive to raise awareness among employees about the Group's values and the importance of respecting every individual. Additionally, we encourage employees to recognize the impact of the Group's activities on human rights and fair labor practices in all countries where we operate. To support this, we provide dedicated training programs and promote an inclusive and open dialogue.

Evaluating Human Rights and Fair Labor in the Supply Chain

We enhance supplier awareness through the following steps:

Supplier Engagement Framework >

When partnering with new suppliers, we will take reasonable measures to ensure their commitment to respecting human rights, upholding fair labor practices, and complying with relevant regulatory and legal standards. This obligation is formally documented and integrated into supplier agreements.

Ongoing ESG Evaluation >

As part of our engagement with key suppliers, we conduct ongoing ESG assessments throughout the lifecycle of projects and asset operations to monitor and enhance social risk management for employees and impacted communities. This process includes regular questioning with suppliers regarding human rights and fair labor practices.

Freedom of Association and Collective Bargaining

Ashtrom Group acknowledges the fundamental right to freedom of association and collective bargaining, as outlined in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We respect employees' rights to join trade unions, engage in collective bargaining, and participate in representative organizations of their choice. We actively support open and constructive dialogue between employers and workers to ensure their voices are heard and their rights are upheld.

Policy Implementation Mechanism – Roles and Responsibilities:

01 Compliance Function

The head of Sustainability and Innovation of Ashtrom Group oversees the coordination of activities necessary for the effective implementation and continuous monitoring of this policy, with a particular emphasis on its adoption among our suppliers. Additionally, the head of Sustainability and Innovation is responsible for providing annual reports to the company's management.

02 Human Resources and Supply Chain/Acquisition Managers

The relevant senior managers of Ashtrom Group are responsible to act in order to ensure full compliance with this policy and the implementation of the associated work procedures. They are empowered to oversee their respective areas, identify challenges, address issues as they arise, and provide appropriate reporting to support policy adherence. Ashtrom Group Management

03 Ashtrom Group Management

The management is responsible for overseeing and ensuring the effective implementation of this policy across the Group. This includes reviewing reports and conducting annual discussions on the subject.

04 Employees of the Group and Its Subsidiaries

Employees of the Group and its subsidiaries are responsible for full compliance with the guidelines outlined in this policy within their respective areas of activity and responsibility, as well as adhering to the accompanying work procedures.

Continuous Improvement

Ashtrom Group recognizes that safeguarding human rights and ensuring fair employment is an ongoing process. We are committed to continuously enhancing our policies and refining implementation procedures. This process will focus on:



Innovation

We will actively seek and adopt new technologies and solutions that minimize our environmental impact while promoting human rights protection and fair employment practices.



Review and Update

The policy will be reviewed regularly to ensure alignment with current legislation, regulations, and emerging technologies. Stakeholder feedback will also be considered as part of this review process.

Publication and Communication of the Policy

Ashtrom Group's Human Rights and Fair Labor Policy is accessible to all stakeholders on the Group's website. A summary on our activities in this area is included in the Group's ESG report.

We welcome our stakeholders to share their feedback, suggestions, and ideas on this topic at: esg@ashtrom.co.il

This policy is written in the masculine form for convenience only and applies equally to all genders.