



# HUMAN RIGHTS & LABOR POLICY



**SHOWDOWN DISPLAYS EUROPE (hereinafter as 'SDE')**  
**Human rights & labor policy**

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## **1. Introduction**

At Showdown Displays Europe s.r.o. (hereinafter 'SDE') we are committed to conduct our business with integrity, honesty and fairness. We, being all SDE employees, do this in compliance with applicable laws and the SDE Code of Conduct and its underlying policies. SDE is a responsible international enterprise.

The areas where we can make the largest contribution, both to the world economy and sustainable development, are tied to our business, our people and our activities. We respect and support the dignity, wellbeing and human rights of our employees, the communities we work in and everybody involved in our operations. The Human Rights and Labor Policy takes account of the interests of our various stakeholders. They include employees, shareholders and financial institutions, suppliers, clients, government bodies, educational and knowledge institutes, industry and society associations (including NGOs) and the communities in which SDE operates.

## **2. To whom does this policy apply**

The Human Rights and Labor Policy applies to SDE, its subsidiaries and all its employees performing work for SDE throughout the world. This includes current employees and persons working for SDE through an employment agreement, as a (statutory) director, worker through an employment agency or as an intern. Any reference to 'you' in this policy refers to persons in this group. Our human rights and labor principles are a fundamental part of the way we do business and we promote the same principles in our relationships with customers, suppliers and other business partners.

## **3. What are our human rights and labor principles**

The Human Rights and Labor Policy is developed in line with the principles of the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and applicable national and international labor laws, including the conventions of the International Labour Organization ('Human Rights and Labor standards'). SDE is committed to comply with the Human Rights and Labor standards. In the course of our business we treat everybody with dignity, respect and fairness. We seek to identify adverse impacts related to human rights and labor caused by our business activities before they occur and take appropriate steps to avoid, cease, minimize or mitigate them. We apply the following guiding principles.

### **a. No forced labor, modern slavery or human trafficking**

SDE is committed to upholding the human rights of workers, and to treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

SDE does not tolerate any form of forced or involuntary labor and any form of (modern) slavery or human trafficking and is committed to prevent these practices in its operations and projects.

**b. No child labor**

SDE does not tolerate child labor and applies the national laws on the applicable statutory minimum age for workers. We are committed to prevent child labor in our operations and projects.

**c. Freedom of association, the right to collective bargaining and employee representation**

SDE respects the right of its employees to the freedom of association and collective bargaining. We recognize the right of employees to be represented by employee representatives. In accordance with the applicable laws, SDE collaborates and engages in close, structured consultation with the employee representative bodies within our company and its subsidiaries.

Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

**d. Work culture**

SDE is committed to create a diverse and inclusive workplace that challenges and inspires its employees to build their careers and achieve their potential within SDE. It is our responsibility to establish a work culture based on trust and recognition. We promote clear communications and are open to receive suggestions, ideas and criticism. SDE aims to prevent issues of conscience in the performance of duties and provides assistance to find proper solutions if such issues were to arise. SDE is supportive of a work culture where employees put the SDE Code of Conduct and its underlying policies into practice.

**e. No discrimination and harassment**

SDE is committed to prevent undesirable conduct such as discrimination, harassment, bullying, intimidation and abuse of authority. SDE does not accept any discrimination whether related to race, color, nationality, ethnic background, age, religion, political opinion, gender, pregnancy, sexual orientation, marital status, disability, or any other characteristic protected by applicable law.

SDE is committed to a diverse, productive work environment that is free from unlawful discrimination or harassment. SDE is devoted to creating this type of environment as we believe it brings out the full potential within each of us, which in turn contributes directly to our success. This commitment is reflected in our employment practices and decisions regarding recruiting, developing and retaining a highly qualified, diverse and dedicated work force, the promotion of equal employment opportunities, and by compliance with the letter and spirit of fair employment practices, working conditions, working hours and nondiscrimination laws.

#### **f. Equal opportunities, talent development and diversity**

SDE applies an equal opportunities policy for all employees to develop and grow, without any discrimination, whereby the principle 'the best person for the job' is leading. This applies to recruitment, training and promotion. SDE pursues a personnel policy to ensure the best possible use of each person's skills and to encourage personal development to attract and retain talented persons. We value diversity and the differences between our employees. SDE has a broad view towards diversity and aims for a diverse composition of the work force among others including age, gender, knowledge, education and experience.

#### **g. Safety and health**

Safety and health are a top priority in everything we do. We take care of the safety, security and health of everyone involved in our activities, including the communities we work in. We show our commitment to prevent accidents. SDE offers, promotes and continuously improves safe and healthy working conditions in accordance with the ISO 45001 standard.

#### **h. Labor conditions**

SDE applies fair employment practices in every aspect of its business and offers good and competitive terms of employment. We apply applicable national legal requirements and agreed industry standards regarding wages and working hours. SDE is committed that all employees work on the basis of a freely agreed, written employment contract with clear terms and conditions in a language they understand.

#### **i. Communities**

We respect the rights of the communities where we work and are committed to being an active member of society.

### **4. What is expected from you**

Compliance with the Human Rights and Labor Policy is essential in the day-to-day business of SDE. SDE expects you to avoid any behavior which constitutes a (potential) breach of the Human Rights and Labor Policy, regardless of the location and the local customs of the country where you are working and even if you think it would benefit the company.

### **5. How to deal with business partners**

At SDE we are committed to conduct business with integrity, honesty and fairness in compliance with applicable laws, the Human Rights and Labor standards. We expect our business partners, like joint venture partners, suppliers and agents to do the same.

SDE and its subsidiaries are committed to cooperate with companies that share our values regarding respect for human rights, integrity, and environmental responsibility.

## **6. Accountability and governance**

The responsibility for the Human Rights and Labor Policy and the management of human rights and labor risks sits ultimately with the Board of Management. Compliance of the Human Rights and Labor Policy is monitored by management, the HR Manager, the Compliance & Sustainability Manager and through audits performed by the internal auditor. The Board of Management and the Compliance & Sustainability Manager review the content of this policy with the HR Manager on a yearly basis.

In a world where valuable data is increasingly proliferated and can so easily be misused, SDE places importance on protection of personal and customer data and takes its responsibility seriously to securely handle this data. SDE is committed to complying with all local legal requirements relating to the handling of data in all territories in which we operate. In addition, we strive to adhere to our contractual commitments and ensure protection of all data entrusted to us by our customers.

SDE may perform investigations and audits from time to time to verify that business is being conducted in compliance with this Human Rights Policy. All SDE employees, management and executives, suppliers, and business partners are expected to fully and promptly cooperate with SDE's internal and external auditors and investigators and must respond fully and truthfully to their questions, requests for information, and documents.

This Policy has been approved by SDE board of management and will be reviewed from time to time. Human rights risks are reported to the Board as appropriate.

## **7. How to report (suspected) misconduct**

If you are an employee of SDE and you believe that anyone who is involved in the business of SDE is attempting to breach or has breached the Human Rights and Labor Policy, you are expected to report this to your (direct) manager or in line with the Whistle-blowing Policy to the responsible officer.

Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy as permitted by applicable law. SDE will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with an investigation, even when no evidence is found to substantiate the report.

Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in the criminal prosecution of responsible individuals.

## **8. Where do you find The human rights and labor policy**

The Human Rights and Labor Policy is available on the SDE website ([www.showdowndisplays.eu](http://www.showdowndisplays.eu)) and the SDE intranet (Sharepoint).

Approved by Board of Management

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