



# Human Rights Policy

v2. 2025



# CEO Statement

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At Ontex, respect for human rights is central to our operations. We are committed to ensuring that these rights are upheld across our business and supply chains, positively impacting our people, suppliers, consumers, and the communities we serve.

**Gustavo Calvo Paz, CEO**



## Purpose

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This policy outlines Ontex's commitment to respecting human rights—fundamental rights and freedoms that belong to everyone, everywhere. It sets out clear principles to embed these values throughout our operations and value chain, ensuring that all people are treated with dignity, fairness, and equality, regardless of their background or circumstances.

## Scope

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This policy applies globally to all Ontex employees, contractors, suppliers, and other individuals or groups directly connected to or impacted by our operations.



# People at the heart

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At Ontex, respecting human rights is at the core of everything we do. We are committed to upholding the highest standards of fairness, equality, and dignity in all our activities, ensuring that every individual is treated with respect and provided with a safe and supportive environment.

Recognizing that all human rights are equally important, we acknowledge the need to address all adverse impacts. However, when necessary, we prioritize action based on the severity of risks, with special focus on issues affecting vulnerable individuals, such as child labor, forced labor, and unsafe working conditions.





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# Commitment to respect human rights

Ontex is committed to developing robust mechanisms to identify and address actual or potential adverse human rights impacts, and to ensure that we take proactive steps to prevent harm and resolve issues effectively. This includes not causing, contributing to, or being directly linked with adverse human rights impacts. We use the following frameworks to guide our approach:

- The International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.
- UN Guiding Principles on Business and Human Rights (UNGPs).
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.
- OECD (Organization for Economic Cooperation and Development) Guidelines for Multinational Enterprise on Responsible Business Conduct.
- OECD Due Diligence Guidance for Responsible Business Conduct
- UN Global Compact Principles.
- Principles on Human Rights and the Environment”, (UN Report, 2018).

## Human rights due diligence (HRDD)

We are committed to conducting regular human rights impact assessments in a systematic and holistic manner, using a risk-based due diligence approach to identify, assess, manage and mitigate adverse human rights impacts throughout our operations and value chain.

At the heart of this process are people, and we are committed to identifying and addressing the specific needs of vulnerable groups, including women and gender minorities, indigenous and ethnic minorities, people with disabilities, child and young workers, low-income workers, and migrant workers.



## 1.1 Inclusive, non-discriminatory and diverse workplace

We value diversity and are committed to fostering an inclusive and respectful workplace where all individuals are treated with dignity. We are committed to providing equal employment opportunities and prohibit discrimination and harassment based on race, gender, religion, disability, sexual orientation, age, nationality, or any other personal characteristic protected by law.

Further information is available in our [Diversity, Equity and Inclusion Policy 2024. Antiharassment.](#)

At Ontex, we have an unequivocal commitment to maintaining a workplace and a supply chain that is free from all forms of harassment. We define harassment as any unwelcome conduct, verbal, physical, or visual, that creates an intimidating, hostile, or offensive environment for any individual. This includes, but is not limited to, bullying, sexual harassment, discrimination, and any behavior that undermines an individual's dignity or rights.

Harassment can occur in various forms, including:

- **Verbal harassment:** Inappropriate jokes, slurs, or derogatory comments.
- **Physical harassment:** Unwelcome physical contact or threats of violence.
- **Visual harassment:** Offensive gestures, displays, or imagery.

We recognize that certain groups, including women, migrant workers, and individuals from minority communities, may be at an increased risk of harassment. Therefore, we actively work to identify, prevent, and address these risks through robust policies, training, and operational grievance mechanisms.

Ontex strictly prohibits discrimination, harassment, and retaliation in any form, and is dedicated to creating a respectful, supportive workplace where all employees are treated with dignity and respect. We uphold these values in our hiring practices, promotions, training, and all other aspects of employment.



## 1.2 Freedom of association & collective bargaining

We respect workers' rights to join or refrain from joining unions and actively engage in social dialogue, adhering to ILO Conventions 87 and 98. Our commitment includes fostering constructive dialogue with union representatives to ensure fair, good-faith negotiations on collective agreements and conflict resolution.

- **Freedom of association:** all workers have the right to join, form, or refrain from joining a labor union of their choice, without fear of reprisal, intimidation, or harassment. Where workers are represented by a legally recognized union, we respect their right to representation and remain neutral in the organization of unions where they do not yet exist.
- **Collective bargaining:** ensuring negotiations take place in good faith to reach agreements that respect workers' rights and contribute to the sustainable development of the company.
- **Social dialogue:** all workers have the right to engage in social dialogue, encompassing negotiation, consultation, and information exchange between workers, management, and, where applicable, government representatives. Further information is available in our [Diversity, Equity and Inclusion Policy 2024.](#)



### 1.3 Child labor and young workers

We have a strict **zero tolerance** for child labor. No one under the age of 15 will be employed in any capacity within in our operations or supply chain. We follow the **UN Convention on the Rights of the Child** and **ILO Convention 138**, which guide us in protecting children’s rights.

For **young workers** (ages 15-18), we ensure that they are only assigned to safe, non-hazardous tasks that will do not interfere with their education or well-being. We do not allow anyone under the age of 18 to perform hazardous work, as defined by international human rights law.

We also respect and require our full value chain to respect local laws, which may have stricter rules or higher age limits, ensuring full compliance in every region in which we operate.

**Our commitment is simple: safe, responsible work for young workers, and no child labor.**



### 1.4 Forced labor and modern slavery

**Ontex prohibits all forms of forced labor and modern slavery, including human trafficking, bonded labor, child labor, and domestic servitude.**

We are committed to ensuring that no one is forced to work under threat, intimidation, or coercion, whether through physical, psychological, or financial means.

To learn more about our efforts to combat modern slavery and human trafficking, please visit our **[Modern Slavery Statement](#)**.



### 1.5 Health and safety

We are committed to providing a safe and healthy workplace for all employees, with the goal of **zero accidents**. We prioritize compliance with local safety regulations and continually enhance our health and safety standards through proactive measures, including employee engagement, regular training, and hazard mitigation strategies.

We are committed to ensuring health and safety throughout our supply chain. We require our suppliers to uphold rigorous standards, maintaining safe, hazard-free workplaces that comply with all applicable local and international health and safety regulations.

Through active collaboration and regular monitoring, we address potential risks and implement measures to safeguard the well-being of all workers involved in our operations, from production to delivery.

**We foster a culture of safety and responsibility within our organization and across our supply chain. Our goal is to ensure a working environment where everyone—whether directly employed or part of our extended operations—can thrive in a safe and healthy setting.**



### 1.6 Fair wages and working conditions

Treating people with fairness and respect is a core principle that extends to everyone in our organization and across our value chain. We go beyond legal compliance to foster a supportive environment where every individual feels valued and respected.

Fair wages are a non-negotiable part of our commitment. We are dedicated to ensuring that all workers, whether directly employed by us or part of our value chain, are treated with dignity and paid fairly for their contributions.



### 1.7 Data protection and privacy policy

We are fully committed to safeguarding the confidentiality and security of employees, suppliers, and customer information. We handle all personal data with the utmost care and in full alignment with all legal and regulatory requirements, ensuring it is protected throughout its lifecycle.

We adhere to international privacy standards, including the **General Data Protection Regulation (GDPR)** and other applicable data protection laws. This ensures that we implement robust systems and processes to prevent unauthorized access, misuse, or breaches of personal data.

We continuously review and update our data protection practices to ensure compliance with evolving regulations and technological advancements.

Our aim is to handle everyone’s data responsibly, transparently, and in full compliance with privacy laws.

Our commitment to data protection includes:

• **Employee data protection**

We ensure that all employee information is stored securely and used solely for legitimate business purposes, in line with employment laws and company policies. Access to this data is restricted to authorized personnel only, and we provide ongoing training to staff on data protection practices.

• **Supplier and customer data protection**

We take all necessary measures to protect the sensitive business and personal data shared with us by suppliers and customers. This includes implementing strict access controls, secure data storage, and regular audits to prevent unauthorized access or misuse.



### 1.8 Healthy environment and community impact

Environmental protection is an integral part of our commitment to human rights, recognizing the right to a clean, healthy, and sustainable environment. Environmental degradation threatens people’s dignity, health, and livelihoods, with a disproportionate impacts on vulnerable communities.

Vulnerable communities refers to groups that are at increased risk of human rights violations due to factors such as discrimination, marginalization, or limited access to resources. These communities often include women, children, ethnic and racial minorities, indigenous peoples, migrants, persons with disabilities and persons living in poverty.

Recognizing and addressing the specific needs of these groups is essential to ensure their protection and fulfillment of their human rights.

We are dedicated to minimizing the environmental impact of our operations, products, and supply chain. By collaborating with our partners, we promote sustainable practices, improve resource efficiency, and support innovative, eco-friendly solutions.

**Through transparency, inclusivity, and cooperation, we strive to uphold human rights, advance environmental and climate justice, and contribute to a sustainable, equitable future for all.**

# Appropriate actions

The actions Ontex takes to prevent, mitigate and remediate adverse human rights impacts depend on the company's relationship to the impact. This involvement is assessed on the basis of a cause, contribute and/or direct link framework. The determination of appropriate action also varies according to the extent to which Ontex has leverage in addressing the adverse impacts.

The first step in deciding the right actions is understanding Ontex's role in the impact, whether we caused it, contributed to it, or are directly connected to it through our operations or business relationships.

## 2.1 Preventive and mitigating human rights abuses

Preventing and mitigating human rights issues is not just about policies and procedures, it is about proactive measures to creating a culture where everyone feels safe, valued, and empowered to do the right thing.

**Our approach is simple: educate, engage, and support, with a constant focus on doing better every day.**

- **Empowering our people:**

We strive to ensure that everyone is on the same page. Every new employee receives a clear introduction to our corporate values and core policies, including the tools available to protect human rights.

- **Supplier engagement:**

We are in this together. That is why we have made it clear that we expect the same human rights commitment from them as we do from ourselves. Each supplier must acknowledge our [Supplier Code of Conduct](#), which outlines our expectations regarding human rights, labor standards, business ethics, and environmental responsibilities.

- **Keeping an eye on potential risks:**

We proactively assess risks in our own operations and throughout our value chain. This helps us identify and focus on potential human rights issues before they become problems.

- **Encouraging open conversations:**

If someone sees something that does not seem right, whether it is an employee or an employee of a supplier, a consumer, or a third party, they can report it safely and confidentially. We are committed to ensuring that no one ever fears retaliation for raising a concern.

**We want everyone to feel comfortable speaking up.**

Our goal is to create a workplace and a supply chain where human rights are respected, and everyone is treated with dignity and fairness. We are committed to building this culture together, with intention, transparency, and care.





### Whistleblower/Speak up line: your voice matters

That is why we have a Whistleblower/Speak Up Line, an effective grievance mechanism for potentially impacted stakeholders. A confidential and anonymous way for all our employees, suppliers, and partners to raise concerns or report issues related to human rights, safety, and/or any ethical matter.

Your voice is important, and we want to make sure it's heard without fear of retaliation. The Whistleblower/Speak Up Line allows you to share your concerns securely and anonymously, no matter where you are or what your role is. We have designed this tool to be accessible to everyone, including those without internet access, because we believe that everyone deserves a safe space to speak out.

Whether you prefer to report online, by phone, or through other means, the Whistleblower/Speak Up Line is always open, and it's completely anonymous. We take every report seriously, investigating thoroughly and ensuring that all concerns are addressed promptly and fairly. And, most importantly, you can trust that there will be no retaliation for speaking up.

### 2.2 Provide or cooperate in remediation

Ontex is dedicated to respecting and upholding human rights across our own operations, the entire value chain, and business relationships. We recognize that individuals whose rights are harmed by abusive and non-compliant business activities must have access to remedies.

Engagement with stakeholders, including employees, suppliers, customers and consumers, is central to our human rights due diligence program and our commitment to responsible sourcing, we prioritize efforts with suppliers based in high-risk countries, where human rights risks are more pronounced.

We recognize that meaningful dialogue is essential to understanding the unique challenges they face, and the potential human rights impacts of our operations.

Through dialogue, consultation, and regular feedback sessions, we actively seek input to identify and address risks and improve our responsible practices.

While we strive to prevent human rights abuses through proactive measures, we are also committed to taking immediate action when problems arise.

- **In our operations:**  
If a violation occurs within our operations, we will take corrective action to mitigate impacts, restore rights (remediation), and implement measures to prevent recurrence.
- **In our value chain:**  
When adverse impacts occur in our supply chain or business relationships, we will use our leverage to prevent and mitigate harm. We work closely with suppliers to identify root causes and implement action plans to resolve issues.

For further information on our stakeholder engagement practices, please visit [www.ontex.com](http://www.ontex.com)



### 2.3 Mechanisms of controls

We believe in being transparent and accountable for our human rights commitments. To make sure we are on right track, we have set clear Key Performance Indicators (KPIs) in our sustainability strategy that help us measure our progress and identify where we can improve. These KPIs keep us focused on what matters most: **people**.

Here's how we track our progress:

- **Social audits:**  
We monitor compliance with these principles in our own operations and among key suppliers.
- **Complaints and resolutions:**  
We track and follow up on concerns raised through our Whistleblower/Speak Up Line. This shows how responsive we are to issues and helps us to continually improve.
- **Selecting suppliers reviewing Corporate Sustainability Responsible criteria.**

These KPIs are not just numbers. They are a way for us to stay on top of our commitments and make sure we are always improving. We use them to guide our actions, ensure transparency, and keep building a more responsible, ethical business.

## We are committed to transparency in all we do

We are committed to transparent reporting on how we address human rights impacts, including detailing outcomes and planned future initiatives, both within our organization and to external stakeholders.

Publicly available information on our human rights progress and reports can be accessed here:

- **[Our policies and commitments](#)**
- **[Modern Slavery Statement](#)**
- **[Supplier Code of Conduct](#)**

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**Gustavo Calvo Paz**  
CEO

Aalst, Belgium, January 22, 2025.

## Governance and accountability

The Ontex Sustainability Department is responsible for overseeing this policy. The Group Responsible Sourcing Specialist leads stakeholder consultations, integrating insights into supplier risk assessments. We collaborate with legal, compliance, procurement, and quality teams to monitor and improve worker conditions and human rights across our supply chain.

This policy will be reviewed every three years. However, it may be revisited earlier if there are significant changes in applicable regulations, risk assessments, or emerging sociopolitical and environmental conditions, to ensure its ongoing relevance and effectiveness.

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**Annick De Poorter**  
Sustainability Lead

## Contact

For questions regarding this policy or human rights topics, contact us at:

**[sustainability@ontexgroup.com](mailto:sustainability@ontexgroup.com)**

At Ontex, we're dedicated to creating an open and honest environment where anyone can raise concerns about human rights without fear of retaliation. Whether you're an employee, supplier, worker of a supplier, or part of our wider network, we encourage you to report any issues or potential violations of human rights in our operations or supply chain.

If something doesn't feel right, we're here to listen. You can always "speak up" through our available channels, including the **[Speak Line](#)**.



# Glossary

- **Rightsholders:** Individuals or groups who possess legal or moral claims to human rights as recognized under international human rights law. Rightsholders include, but are not limited to, employees, workers in supply chains, consumers, local communities, and vulnerable groups affected by business activities.

- **Child labor:** Employment of individuals below the minimum legal working age (15 years or higher based on local law).

- **Forced labor:** Work performed involuntarily under threat or coercion, including bonded labor, trafficked labor, and prison labor.

- **Salient human rights risks:** The most significant human rights issues that pose risks to individuals within Ontex's operations and supply chains.

- **Vulnerable groups:** Populations at a higher risk of human rights violations, including young workers, migrant workers, women, and marginalized communities.

- **Human rights due diligence:** A systematic process of identifying, assessing, managing, and mitigating adverse human rights impacts within Ontex's operations and Ontex value chain.

- **Freedom of association:** The right of workers to join, form, or refrain from joining a labor union of their choice without fear of reprisal or harassment.

- **Collective bargaining:** The process of negotiations between employers and workers' representatives to reach agreements on working conditions, wages, and benefits.

- **Supplier code of conduct:** A set of ethical guidelines and expectations for Ontex's suppliers, covering areas such as fair wages, safe working conditions, and respect for human rights.

- **Grievance mechanisms:** Formal processes through which individuals or groups (rightsholders) can raise concerns, complaints, or grievances related to adverse impacts on their rights caused by a company's operations, products, or business relationships.

- **Modern slavery:** Severe forms of labor exploitation, including forced labor, human trafficking, bonded labor, and domestic servitude.

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