

SOCIAL RESPONSIBILITY POLICY



SUSTAINABLE DEVELOPMENT, INTEGRITY, RESPECT



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1. Introduction

In the conditions of competition caused by free movement of labor within the European Community, we propose to adapt the Social Responsibility Policy to achieve the alignment of this field at European level.

This Policy applies to the following companies in the ROMCARBON GROUP: ROMCARBON SA, LIVINGJUMBO INDUSTRY SA, RC ENERGO INSTALL SRL and INFO TECH SOLUTIONS SRL.

1.1. Purpose of the Social Responsibility Policy

ROMCARBON GROUP is dedicated to respecting human rights and is committed to taking care of its workforce and taking measures to combat discrimination, harassment, forced labor, workplace violence and their impact.

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The purpose of this Policy is to ensure that the ROMCARBON GROUP permanently manages the interests, views and rights of individuals within its workforce, including respect for human rights, throughout the entire flow of activity.

The ROMCARBON GROUP's policy in the field of its workforce aims to ensure the necessary personnel in correlation with the established development objectives, anticipating possible fluctuations in staff shortage or surplus.

This policy reflects the objectives regarding its workforce established in the Group's sustainability strategy regarding:

- **Working conditions;**
- **Equal treatment and opportunities;**
- **Other rights related to work.**

1.2 Scope of the Social Responsibility Policy

This Policy applies to each company in the ROMCARBON GROUP for its own workforce (as defined below).

When used in this Policy, the term own workforce includes each person who works for or provides services to any company in the ROMCARBON GROUP, based on an employment contract or as contracted as an authorized natural person or similar. The term also includes members of the boards of directors and executive management.

1.3. ROMCARBON GROUP's mission and vision regarding human resources

The Group's mission is to ensure competent and motivated employees, who allow the efficient achievement of organizational objectives and increase performance while respecting all requirements regarding social responsibility.

ROMCARBON GROUP's strategy in the field of human resources aims to cover operational needs, through the efficient use of human resources. In this area, we consider defining requirements by developing attributions and responsibilities for the basic activities detailed in the Job Descriptions, identifying and overcoming any limits of the available human resources on the labor market, which could affect the development of activities/projects in progress

Through this policy, the ROMCARBON GROUP reaffirms its commitment to comply with relevant international and local legal requirements, such as:

- **The Universal Declaration of Human Rights, adopted by the United Nations General Assembly through Resolution 217 A (III) of 10 December 1948 in Paris.**
- **The Universal Declaration of Human Rights has the character of customary international law, constituting a point of reference that draws guidelines or lines, and which, although often cited in the fundamental laws or constitutions of many countries, and in other domestic laws, nevertheless does not have the status of an international agreement or international treaty**
- **The Labor Code and relevant legislation on labor relations**

2. ROMCARBON GROUP'S COMMITMENT

2.1 The ROMCARBON Group will make every effort to:

- Carry out all activities in accordance with relevant social legislation and regulations;
- Consider impacts, opportunities and risks from a social responsibility perspective when making business decisions;
- Set objectives and targets to reduce identified impacts and risks;
- Monitor compliance with human rights for its entire workforce;
- Consider and seek to minimize the indirect impact of the ROMCARBON Group on the community;
- Obtains adherence of partners in the value chain to this policy as well as to international regulations on human rights.

2.2. Directions of action

The main directions of action are:

- Creating a transparent and safe working environment, where teamwork is supported and participatory, and responsibility is encouraged;

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- Investing in human resources and monitoring the development of our own workforce from the perspective of continuous improvement, according to the group's strategy and objectives
- Ensuring the adoption of a fair and balanced performance system for our own workforce;
- Increasing the degree of employee satisfaction according to their expectations and those of ROMCARBON GROUP and to this end, evaluating employee perceptions of satisfaction and performance indicators;
- Evaluating employee-related processes as a whole, in an integrated approach, structuring process management, reporting and continuous development;
- Initiating innovative programs with a solution-oriented and problem-solving approach;
- Reducing dependence on external recruitment, when a shortage of qualified personnel is noted within a sector, by carrying out employee development programs;
- Developing by executive management, using mentoring principles and programs, well-trained and flexible teams, teams capable of adapting to a dynamic, constantly changing environment
- Promoting constructive discussions and the exchange of knowledge and information related to the activities carried out in all sectors, to increase solidarity within the ROMCARBON GROUP;
- Improving the use of personnel by introducing flexible organizational models;
- Ensuring equal treatment and opportunities, combating/eliminating harassment and discrimination for the entire workforce.

3. HUMAN RIGHTS POLICY

The ROMCARBON Group is determined to respect human rights in its relationship with each interested party: its own workforce, suppliers, customers, associations, etc. and we want them, in turn, to respect the rights of others.

A wide range of civil, political, economic, social and cultural rights is taken into account, which include the following (the list is not exhaustive):

- **the right to human dignity;**
- **the right to life;**
- **freedom and security of the person;**
- **the right to legal and favorable working conditions**
- **the right to daily and weekly rest;**
- **the right to paid annual leave;**
- **the right to benefit from social security benefits, under the terms of the law;**
- **the right to fair wages and a decent living;**
- **the right to form and join a trade union and the right to collective bargaining;**
- **the right to equal opportunities and treatment in employment relationships;**
- **the right to respect for human dignity and personality within employment relationships, under the terms of the law and internal regulations;**
- **the right to security, protection and health at work;**
- **the right to vocational training, under the law;**
- **the right to adequate working conditions, to the determination and improvement of working conditions and the working environment;**
- **the right to information, under the law;**
- **the right to petition, addressed to the employer, under the law**
- **the right to protection in the event of dismissal;**
- **the right to collective and individual bargaining;**
- **the right to the protection of individual data.**

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- the prohibition of all forms of forced or compulsory labour;
- the prohibition of child labour;
- the prohibition of discrimination;
- freedom of opinion.

Respect for human rights includes, but is not limited to, compliance with corporate policies, applicable laws and regulations, commitments made in relation to stakeholders and contribution to the general well-being of the communities and society in which we operate.

We are dedicated to employment based on legality and fairness and compliance with labor principles and national legislation in force.

ROMCARBON GROUP has implemented a fair remuneration policy, in accordance with applicable laws.

We are dedicated to supporting employees with special needs.

ROMCARBON GROUP will not tolerate any type of unethical practices, such as withholding wages without right, unjustified refusal of sick leave, daily rest, abusive use of alternative forms of employment or avoidance of social contributions.

4. DISCRIMINATION AND HARASSMENT POLICY

ROMCARBON GROUP is dedicated to prohibiting and preventing discrimination of any kind, such as, but not limited to, discrimination based on: race, color, sex, age, language, religion, political or other opinions, ethnic, national or social origin, property, birth, sexual orientation or any other criteria including marital status or parental status, we are also committed to the idea of providing equal opportunities to all people, based on merit.

We support cultural diversity, the creation of an international team and a business community.

We do not tolerate discrimination in relation to employment relationships regarding maternity status and parental leave or paternity leave.

ROMCARBON GROUP is committed to ensuring an optimal work environment, based on respect for the dignity of the human being, and to ensuring all employees, regardless of gender, the necessary conditions for a climate in which trust, empathy, understanding, professionalism, dedication to satisfying the general interest prevail and, as a result, will apply a zero-tolerance policy for harassment based on gender and moral harassment in the workplace, will treat all incidents seriously and promptly and will investigate all allegations of harassment.

According to the implemented Internal Regulation, the manifestation of any unwanted behavior, moral harassment or sexual harassment, with the purpose or effect of creating an atmosphere of intimidation, hostility or discouragement for the affected person at work and which negatively influences the situation of the person targeted by this behavior, their emotional or material state, is sanctioned.

ROMCARBON GROUP will sanction as a serious disciplinary offense any manifestation that is threatening, abusive, exploitative or constitutes sexual coercion, including in the form of gestures, language or physical contact, at the workplace/group premises and in all properties made available, regardless of whether they are owned, rented or contracted.

All employees of the ROMCARBON GROUP have the right to equal pay for equal work, the right to collective bargaining, the right to the protection of personal data, as well as the right to protection against unlawful dismissal. In support of this idea, the ROMCARBON GROUP has taken measures to ensure the protection of workers, so that there is the possibility for employees to present their problems, even under the protection of anonymity, if they request it.

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When hiring, the ROMCARBON GROUP proceeds to hire employees exclusively on the criterion of their professional training and competence, ignoring any aspect related to race, nationality or social origin, religion, disability, gender, sexual orientation, family and/or marital status, family obligations, union membership, political opinions, or any other subjective criteria that may be classified as forms of discrimination.

In terms of remuneration, the ROMCARBON GROUP ensures equal remuneration for employees who perform the same work under identical or similar conditions, regardless of race, nationality or social origin, religion, disability, gender, sexual orientation, family and/or marital status, family obligations, union membership, political opinions, or any other subjective criteria that may be classified as forms of discrimination. The only differentiation allowed between employees who perform similar activities is that related to seniority and work experience, as well as other circumstances that cannot be classified as discrimination (results in professional activity, recognized and appreciated merits).

In terms of promotion, equal opportunities are ensured for all candidates to occupy a job located on a higher hierarchical level, the position being given priority to its own employees who meet the necessary qualification conditions.

Access to training is provided in a non-discriminatory manner, based on annual training and professional development plans, drawn up in consultation with employee representatives or at the employees' own request. For mandatory training included in training and professional development plans, employees are normally remunerated for the hours of course attendance. For training that involves costs, in the form of participation fees or other categories of fees, these will be borne by the employer for all employees, to the extent that they pass the exams and tests related to the respective training.

ROMCARBON GROUP sanctions disciplinary action against any behavior proven to be classified as discrimination of any kind, with sanctions that may extend to the termination of the individual employment contract in cases of sexual harassment or other serious cases of discrimination.

The application of any disciplinary sanction will be made in accordance with the provisions of Law no. 53/2003 - Labor Code, republished, with subsequent amendments and completions, and the Internal Regulations.

To this end, we have implemented the Guide on combating harassment based on gender and moral harassment at the workplace, as well as the mechanism for receiving and resolving harassment cases.

The entire workforce is informed and trained annually with the provisions of this guide, and clear mechanisms are established for monitoring and measuring the implementation of the guide.

5. PERSONAL DATA PRIVACY POLICY

ROMCARBON GROUP is dedicated to respecting the privacy of its employees and collaborators and preserving the confidentiality of their personal information.

We will only obtain and retain personal information necessary for the efficient functioning of our organization, in accordance with Regulation (EU) 2016/679 and internal GDPR procedures and we will always adopt preventive security measures for all databases, to avoid the risks of destruction, loss or unauthorized access.

All staff have been trained in the implemented GDPR procedures and the Data Protection Officer (DPO) is continuously concerned with their compliance.

ROMCARBON GROUP will never alienate to any third party, outside the legal provisions, the personal data of its own workforce. All its own workforce is informed and trained annually with the GDPR procedures and we have established clear mechanisms for monitoring and measuring their application.

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6. POLICY regarding FORCED LABOR, CHILD LABOR

ROMCARBON GROUP does not tolerate forced, involuntary or labor trafficking in any form. This includes work performed without the consent of the person, in slavery or unapproved conditions and other forms of work that are contrary to the will or choice of the person concerned.

Also, within ROMCARBON GROUP, the use of corporal, mental punishment or mental or physical coercion, as well as verbal abuse, is prohibited. Any employee who resorts to such practices, in relation to his colleagues, superiors or subordinates, will be subject to a disciplinary investigation procedure, following which sanctions will be applied according to the internal regulations, from a warning to disciplinary termination of the employment contract.

Employment relationships are voluntary and based on the consent of both parties.

There is no evidence of practices related to forced labor, including, but not limited to, the following:

- **physical, psychological or sexual violence,**
- **forced labor,**
- **unlawful withholding of wages / including payment of employment taxes and / or advance payment for starting work,**
- **restriction of mobility / movement,**
- **retention of passport or identity documents,**
- **threats of denunciation to the authorities**

ROMCARBON GROUP does not charge any fees or withhold employees' identity documents at the beginning of the employment period. In order to comply with the legislative provisions in force, included in the Labor Code, upon employment, employees are requested to present copies of their identity documents and diplomas; as a rule, simple copies will be requested.

The purpose of requesting documents of the nature mentioned above is to constitute the mandatory personnel file for compliance with legal requirements in the field of labor legislation.

The minimum documents that will be required upon employment consist of:

- **copy of the employee's identity card;**
- **copy of the diploma issued by the last educational institution graduated;**
- **copy of the driving license or certificates certifying professional quality, if the position requires such certifications;**
- **medical certificate stating that the employee is medically fit for the position he/she is to occupy;**
- **candidate's CV;**
- **certificate of seniority from the last place of employment, or, as the case may be, REVISAL extract.**

Future employees are informed of the Internal Regulations, so that their decision to sign the employment contract is not affected by defects in consent or incomplete information.

In order to emphasize the fact that the ROMCARBON GROUP offers future employees the opportunity to freely choose whether or not they want to work within the group, future employees are provided with information, prior to employment, such as:

The person selected for employment or the employee, as the case may be, will be informed of at least the following elements:

- a) the identity of the parties;
- b) the workplace or, in the absence of a fixed workplace, the possibility for the employee to carry out his/her activity in different workplaces, as well as whether the travel between them is provided or reimbursed by the employer, according to the case;
- c) the headquarters or, as the case may be, the employer's domicile;
- d) the position/occupation according to the specification of the Classification of Occupations in Romania or other normative acts, as well as the job description, specifying the job duties;
- e) the criteria for evaluating the employee's professional activity applicable at the employer's level;

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- f) the risks specific to the job;
 - g) the date from which the contract is to take effect;
 - h) in the case of a fixed-term employment contract or a temporary employment contract, their duration;
 - i) the duration of the vacation leave to which the employee is entitled;
 - j) the conditions for granting notice by the contracting parties and its duration;
 - k) the basic salary, other constituent elements of the salary income, highlighted separately, the periodicity of the salary payment to which the employee is entitled and the method of payment;
 - l) the normal working hours, expressed in hours/day and/or hours/week, the conditions for performing and compensating for or paying overtime, as well as, where applicable, the methods of organizing work in shifts;
 - m) the indication of the collective labor agreement regulating the employee's working conditions;
 - n) the duration and conditions of the probationary period, if any.
 - o) the procedures regarding the use of electronic signature, advanced electronic signature and qualified electronic signature.
 - p) the right and conditions regarding professional training offered by the employer;
 - q) the employer's support of private medical insurance, additional contributions to the employee's voluntary pension or occupational pension, under the terms of the law, as well as the granting, at the employer's initiative, of any other rights, when these constitute monetary advantages granted or paid by the employer to the employee as a result of his professional activity, as the case may be.
- Employees are informed both verbally and in writing, by making the draft of the individual employment contract and the job description available in advance for study, and in case of acceptance, the two documents are signed.

For reasons related to the non-discrimination policy, equal pay is granted for equal work, which is why the leverage for negotiating individual employment contracts in terms of benefits of any kind is limited.

After being informed about the employer's requirements, on the first day of work, general introductory training in the field of occupational health and safety and emergency situations is carried out; and on the second day of work, training is carried out at the workplace, regarding: own occupational health and safety instructions; existing risks at the workplace; first aid measures in the event of an accident; how to behave in the event of a fire; practical demonstrations, as well as the importance of the job in the production process, the requirements and expectations from superiors. Also, after the general introductory training, new employees are made aware of the provisions of the Internal Regulations and specific procedures.

In the ROMCARBON GROUP, the own workforce is not obliged to work under the threat of violence, penalties or sanctions, has the right to leave the workplace after the end of the usual working day. Any member of the own workforce is free to request the termination of the employment contract/collaboration/mandate, the termination being carried out in compliance with a notice period.








All employees of the group have the right to equal pay for equal work, the right to collective bargaining, the right to the protection of personal data, as well as the right to protection against illegal dismissals.

The ROMCARBON GROUP will not tolerate any form of forced, compulsory or child labor.

The employment of children is prohibited. According to the Labor Code, a natural person acquires work capacity upon reaching the age of 16. However, a natural person may enter into an employment contract as an employee even after reaching the age of 15, with the consent of their parents or legal representatives, for activities appropriate to their physical development, skills and knowledge, if this does not endanger their health, development and professional training. As a result, the ROMCARBON GROUP does not employ children and does not collaborate with suppliers or third parties who employ children under the age of 15/under the age of completion of compulsory education or under the minimum age at which employment is permitted in the respective country, whichever age is higher. In addition, we will not employ children under the age of 18 if they could be involved in work that could be classified as hazardous and we will not tolerate suppliers or third parties who do so.

When employing young people (people under 18 years of age), ROMCARBON GROUP takes into account:

- the normal working time is 6 hours per day and 30 hours per week;

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- the minimum guaranteed wage must be at least equal to the minimum wage in the economy for a normal work schedule (6 hours/day and 30 hours/week, respectively);
- young people under 18 years of age are not allowed to perform overtime work;
- young people under 18 years of age cannot perform night work;
- young people under 18 years of age benefit from a meal break of at least 30 minutes, if the daily working time is more than 4 and a half hours;
- young people up to 18 years of age benefit from an additional vacation of at least 3 working days

Young people accepted to work benefit from working conditions adapted to their age and are protected against any activity that could endanger their security, health, physical, mental, moral or social development or that could compromise their education.

The provisions are established by the Internal Regulations of each company in the ROMCARBON GROUP.

We are committed to respecting all internationally recognized human rights in our operations. Where national and international human rights law differ, we seek to comply with the higher standard/more favorable law.

Within the ROMCARBON GROUP, we take responsibility for ensuring that our entire workforce is treated fairly, with dignity and respect, that we communicate with stakeholders, including populations at risk, to ensure that we listen, learn and consider their views, and that we respect their cultures, customs and traditional rights as we carry out our activities.

We will strive to collaborate with authorities and civil society organizations to make progress in addressing issues and to better understand how we can make a difference.

7. ANTI-RETALIATION POLICY

ROMCARBON GROUP is committed to supporting a culture in which legal and ethical concerns can be raised without fear of retaliation. It is important that legal and ethical concerns are identified and resolved as promptly as possible. Therefore, ROMCARBON GROUP supports a work environment in which its workforce and other stakeholders can report legal or ethical concerns without fear of retaliation (which includes being penalized, fired, demoted, suspended, threatened or harassed).

ROMCARBON GROUP provides communication channels for its employees and other stakeholders to report such concerns and prohibits retaliation against employees and other stakeholders who honestly and in good faith raise such concerns.

Prompt identification of such issues provides ROMCARBON GROUP with the best opportunity to be proactive, to verify and confirm the facts while they are “fresh” and to minimize any potential impact.

Efforts to discourage or prevent someone from reporting such concerns or any retaliation against a person who raises such concerns will not be tolerated and will be treated as a serious matter and subject to disciplinary action.

This Policy applies to all legal and ethical concerns reported (anonymously or otherwise).

Retaliation can take many forms and may include:

- Reduction, addition or modification of duties or hours of work, without the employee’s consent and without receiving an appropriate salary benefit
- Physical abuse or threats
- Verbal abuse or conduct intended to embarrass or humiliate an employee
- Termination, demotion or threats of termination or demotion
- Failure to hire or consider for employment, promotion, salary increase, assignment, transfer or overtime pay opportunities

Ethical and legal issues, as well as investigations, are often complex and multifaceted. It is important that all employees and other parties involved who come into contact with such issues and investigations cooperate fully so that ROMCARBON GROUP can obtain the information necessary to respond to these issues promptly and appropriately

At ROMCARBON GROUP, we ensure that executive management maintains a process of OPEN DOOR.

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Managers must ensure that they are approachable, that they treat legal and ethical concerns seriously, and that they are familiar with the process for raising and resolving such concerns.

It is important that the ROMCARBON GROUP's own workforce and other stakeholders understand that their concerns will be addressed. It is also important that such concerns are raised, reviewed, and promptly escalated for resolution. Once a concern is initially raised, the opportunity to be proactive and address the issue promptly can quickly disappear.

Reporting can be made directly to the Human Resources Services, the Legal Office and/or by accessing the complaint form at <https://whistleblowing.GRUPUL ROMCARBON.com/> (this method can also be used to submit anonymous reports).

Employees and other stakeholders should be aware that reporting systems must be respected and not abused for any reason. Individuals who are identified as making incorrect reports or with improper intent (e.g. to punish or harass a colleague) will be subject to disciplinary action.

ROMCARBON GROUP prohibits:

- intimidation or retaliation against any employee who makes a good faith report about a possible deviation from the provisions of any internal policy or procedure or a legal provision.
- any intimidation or retaliation against any person who provides assistance during the investigation of the possible deviation reported, those who encourage retaliation or threats being sanctioned according to labor law, civil and/or criminal provisions, as the case may be.

In order to promote an ethical working environment, ROMCARBON GROUP guarantees its employees/representatives that they will be able to make any kind of report without fear of retaliation.

ROMCARBON GROUP encourages dialogue and will support anyone who expresses their concern in good faith, ensuring that they will not suffer any unfavorable treatment as a result of their decisions or for reporting.

8. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

ROMCARBON GROUP employees can organize themselves according to their own will.

The management of the ROMCARBON GROUP negotiates with duly elected employee representatives, in good faith and applying all necessary efforts to reach a collective agreement.

The employer only monitors the legality of the election of employee representatives, to ensure that the electoral process is carried out in accordance with the law, and that the representatives are validly elected and will be recognized by the authorities. The Social Dialogue Law prohibits the employer from intervening in or obstructing the electoral process.

The electoral process begins by establishing the number of employee representatives, so it will be necessary for the current employee representatives or employees who are part of the initiative group to address the employer to establish the number of representatives by agreement.

Throughout the term of office, the modification and/or termination of individual employment contracts/service relationships of employee/worker representatives for reasons related to the fulfillment of the mandate received from the employees/workers are prohibited.

The main duties of employee/worker representatives are (Art. 59 – Law 367/2022 on social dialogue):

- a) to participate in the development of internal regulations;
- b) to notify the Territorial Labor Inspectorate regarding non-compliance with the legal provisions and the applicable collective labor contract/agreement;
- c) to participate in the negotiation of the collective labor contract, according to the above law.

The term of mandate of employee representatives is 2 years (maximum 2 years).

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9. IMPACT, RISKS AND OPPORTUNITIES MANAGEMENT (IRO) AND COMPLIANCE

9.1. Identifying and managing impacts, risks and opportunities related to its own workforce

ROMCARBON GROUP is committed to implementing a robust risk identification and management process to address challenges related to social responsibility towards its own workforce. This process should include:

- **Impacts, Risks and Opportunities Analysis (IRO):** Conducting a comprehensive analysis to identify potential issues such as unethical labor practices or human rights violations as well as related opportunities

- **Action Plans:** Developing and implementing action plans to address the effects of identified impacts and risks, ensuring that all appropriate measures are taken.

- **Collaboration with stakeholders:** Collaboration with all stakeholders to improve sustainability practices and reduce associated risks

The analysis of impacts, risks and opportunities (IRO) related to the own workforce is one of the main concerns of the ROMCARBON GROUP as well as essential information for establishing the sustainability strategy.

The main material IROs that have been determined to be important for the ROMCARBON GROUP in terms of the own workforce are:

	Impacts (positive or negative)	Risk	Opportunity
Job security	As a general rule, all employees have employment contract (CIM) and salaries are paid on time. The Group offers employment opportunities, including for low-skilled people, who would otherwise have little chance of supporting themselves through work.	The available workforce is quite limited in the area. In addition, specialized workers are quite difficult to find. Low employee turnover for qualified employees when job security is ensured.	Low employee turnover for qualified employees when job security is ensured. No collective layoffs and no individual dismissals without a justifiable reason
Working time	Any additional time worked by operational employees is paid/compensated with time off.	The available labor force is quite limited in the area. In addition, specialized workers are quite hard to find.	Low employee turnover
Working time	Night shifts taken into account to avoid the costs of stopping production machinery.	The available labor force is quite limited in the area. In addition, specialized workers are quite hard to find.	
Decent pay	Employees are paid more than the minimum wage, according to their experience. Minimum wage paid to entry-level employees.	When the minimum wage increases, it becomes a challenge for the company to maintain the same percentage wage gap between skilled and entry-level employees.	
Social dialogue and collective agreements	Worker representatives are selected. Management discusses their decisions with them to understand the root causes. Then, worker representatives transmit the message to the rest of the employees. This involvement helps workers understand the overall situation of the company and allows them to feel included.	If dialogues with employees are not managed properly, there is a risk of decreasing employee satisfaction, leading to increased employee turnover.	Employees are more productive and engaged when they understand the entire situation. For example, if a decision may be seen as having a negative impact on them (e.g., a reduction in benefits), employees may demonstrate greater understanding if they are informed of the underlying reasons.
Employee health and safety	Romcarbon Group has implemented sound health and safety policies to minimize accidents and occupational illnesses. Work-related - lost time injury - employed and non-employed	1. The risk of not finding enough qualified personnel, which will increase the risk of accidents. 2. The possibility that a potential health and safety hazard will not be identified and included in internal procedures. 3. Risk of accidents Workplace accidents lead to lost working days and trigger investigations that require financial expenses	If employees perceive that the implemented procedures ensure their safety, they are more likely to stay at Romcarbon for a long period, which leads to lower turnover rates.

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		(time, people, money) and higher costs for accident insurance.	
Gender equality and equal pay	At Group level - internal policies are also focused on gender equality; We have women in key senior management positions Equal pay for equal work: calculations performed	Due to the specifics of the sector, especially on the operational side, female candidates are very limited.	Employees are more productive and engaged when they feel included. An equitable work environment attracts more valuable employees. Take advantage of the different perspectives, experiences, know-how that diversity brings. If employees believe they are developing professionally (specialized training) and personally (soft skills training), they are likely to stay at Romcarbon. Reduce the gap in specialized employees with internal programs. Collaborate with schools to prepare specialized candidates for future roles at Romcarbon. Employees are more productive and engaged when they feel included. An equitable work environment attracts more valuable employees. Take advantage of the different perspectives, experiences, know-how that diversity brings.
Training and skills development	Training plan for all employees to develop their skills	Lack of training poses risks such as: - Work accidents - Failure to follow procedures - Increase in waste and non-compliant products - Failure to comply with regulations leading to fines - customer complaints	
Diversity and inclusion	At Group level - internal policies are also focused on gender equality; Women in key senior management positions Equal pay for equal work: calculations performed	Due to the specifics of the sector, especially on the operational side, female candidates are very limited.	
Combating violence and harassment in the workplace	At Group level there is a code of conduct and internal procedures	Image and Regulatory Risk Given the inherent risk of the industry, the Company may implement additional controls	
Child labor	At Group level there is a code of conduct and internal procedures	Image and Regulatory Risk Given the inherent risk of the industry, the Company may implement additional controls	
Forced Labor	At Group level there is a code of conduct and internal procedures	Image and Regulatory Risk Given the inherent risk of the industry, the Company may implement additional controls	
Suitable accommodation	At Group level there is a code of conduct and internal procedures	Image and Regulatory Risk Given the inherent risk of the industry, the Company may implement additional controls	
Privacy policy	Employee data is secured based on the internal personal data protection program	Regulatory risk in case of personal data leaks - GDPR fines	

9.2. Ensuring compliance with relevant legislation and international standards

ROMCARBON GROUP is committed to complying with all applicable laws and adhering to relevant international standards for sustainability, including:







- **Legislation and regulations:** Ensuring ongoing compliance with national and international legislation in the field
- **International standards:** Aligning with the implementation of best practices and international standards in the field of sustainability to guide operations and relations with its workforce

9.3. Periodic audits and evaluations

To ensure ongoing compliance with sustainability commitments and compliance with relevant legislation, ROMCARBON GROUP is concerned with conducting periodic audits and assessments:

- **Regular audits:** Scheduling and conducting regular audits to verify compliance with the social responsibility policy and applicable legal requirements.
- **Performance Analysis:** Data collection and analysis to assess progress in the field of sustainability and to identify areas requiring improvement, which is carried out annually, including by analyzing the responses to the Employee Satisfaction Assessment Questionnaire and the Employee Consultation Questionnaire
- **Actions:** Implementation of actions and measures when non-compliances are identified

Through these measures, the ROMCARBON GROUP aims to strengthen its capacity to manage sustainability risks related to its workforce and to ensure a high level of compliance with relevant legislation and international standards. This approach not only protects

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the group and its partners from potential risks and penalties, but also contributes to building a solid reputation as a responsible leader in sustainability.

10. SOCIAL RESPONSIBILITY OBJECTIVES AND INDICATORS

Sustainability risks were taken into account, together with impacts and opportunities, in the process of developing the Group's specific sustainability strategy. Sustainability risks assessed as material are those that have the potential to significantly affect the Group's activity. Thus, the measures identified to meet the sustainability objectives are constituted as measures for sustainable business development.

The objectives and indicators established by the ROMCARBON GROUP Sustainability Strategy, horizon 2025-2050, are:








Objective	KPI
<ul style="list-style-type: none"> Covering own workforce with employment contract(CIM) for an indefinite period Ensuring and respecting a work schedule that ensures the maintenance of a balance between professional and private life Ensuring dialogue with employee representatives regarding workforce issues 	<ul style="list-style-type: none"> 95% of the total own workforce with permanent employment contract 100% of unused vacation days in total vacation days due according to CIM 100% of eligible employees who benefited from leave for family reasons broken down by gender/total employees 100% employees covered by collective employment contract/total employees 100% of employees represented/ total employees Minimum 1 consultation between management and employee representatives 100% employees covered by OSH Management System based on legal requirements and/or standards (as number of people, not based on number of working hours)/ / total employees
<ul style="list-style-type: none"> Reducing the number of work accidents 	<ul style="list-style-type: none"> 0 deaths due to work-related injuries/work-related illnesses 0 work-related accidents 0 cases of work-related illnesses 0 days lost due to work-related injuries and work-related deaths/work-related illnesses and deaths caused by illnesses
<ul style="list-style-type: none"> Ensuring gender equality in promoting women to leadership positions Ensuring gender equality in remuneration Providing training and skills development programs Ensuring a work environment free from violence and harassment Ensuring the confidentiality of employees' personal data 	<ul style="list-style-type: none"> 50% women in senior and mid-level management positions/total positions 100% gender equality in remuneration 100% of employees who participated in periodic performance and career development evaluations broken down by gender/total employees 30 hours of training per employee per gender 0 complaints/grievances/notifications 0 complaints/grievances/notifications

For each objective, actions and measures are determined, as well as deadlines and responsibilities.

11. TRANSPARENCY AND REPORTING

11.1. Communicating commitment and performance in the field of social responsibility

ROMCARBON GROUP places particular emphasis on transparency in all aspects related to social responsibility, recognizing that this is essential for building and maintaining the trust of its workforce, through:

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• **Policy publication:** The Social Responsibility Policy is published on the website www.romcarbon.com, to ensure a clear understanding of expectations.

• **Performance reporting:** It regularly communicates its performance and progress in the field of sustainability through annual reports published on the website www.romcarbon.com (**Sustainability Report**) and current reports, updates on the website

11.2. Reporting progress and challenges

ROMCARBON GROUP adopts a transparent and honest approach in reporting progress and challenges encountered in sustainability:

• **Reporting:** Provides details on concrete measures taken to address sustainability issues, their impact and challenges encountered through the **Sustainability Report** and published policies;

• **Objectives and performance indicators:** It is concerned with the inclusion in the **Sustainability Strategy** of clearly defined objectives and performance indicators (KPIs) measured and monitored permanently to facilitate tracking progress and assessing the effectiveness of the actions taken.

11.3. Stakeholder feedback and continuous improvement

ROMCARBON GROUP's commitment to continuous improvement is fueled by stakeholder feedback:

• **Stakeholder consultation:** Initiates and maintains open communication channels with customers, suppliers, employees and other stakeholders, to collect their feedback, including in the analysis of dual materiality;

• **Feedback meetings:** Is open to organizing feedback meetings with stakeholders to discuss performance in the field and to identify opportunities for improvement.

• **Feedback-based improvement processes:** Implements changes and improvements in its policies and practices based on feedback received from stakeholders, engaging in a continuous cycle of evaluation and improvement.

Through these measures, ROMCARBON GROUP demonstrates its commitment to complete transparency and continuous improvement of its performance in the field of social responsibility, while strengthening the relationship of trust with stakeholders and promoting an organizational culture based on responsibility and openness.

12. TRAINING AND AWARENESS RAISING

12.1. Internal skills development

For the ROMCARBON GROUP, the development of internal skills is essential for the effective implementation of the social responsibility policy and as a result ensures:

• **Training programs:** Organizes training programs, emphasizing the understanding and application of the principles of social responsibility, human rights, non-discrimination, etc.

• **Workshops and seminars:** Participation in workshops and seminars to keep employees up to date with the latest trends, regulations and best practices in the field of sustainability.

• **Expert consultations in the field:** Collaboration with external consultants to bring a competent perspective to employee training and to ensure that the approaches adopted are in line with international best practices.

12.2. Employee awareness and training on the importance of sustainability

To raise employee awareness on the importance of sustainability is fundamental to creating a culture that values and supports responsible practices, ROMCARBON GROUP organizes:

• **Regular internal communication:** Use internal communication channels, such as internal memos, meetings and online platforms, to share success stories, challenges and lessons learned related to sustainability.

• **Encourage individual initiative:** Promote individual initiative and employee involvement in sustainability projects, offering recognition and rewards for innovative and effective contributions.

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Through these efforts, which are focused on in this Social Responsibility Policy, the Group's management aims to increase the level of knowledge and involvement of its workforce, ensuring that it actively contributes to achieving its sustainability objectives.

13. FINAL PROVISIONS

13.1. The process of periodic review of the Social Responsibility Policy

ROMCARBON GROUP recognizes the importance of maintaining its Social Responsibility Policy relevant and effective in the face of constant changes in the business environment and society.

To this end, it has established a periodic review process:

- **Annual assessment:** Establishing the annual assessment of the social responsibility policy to identify any needs for updating. These assessments also take into account feedback from stakeholders, sustainability performance and changes in relevant legislation.
- **Working groups:** Forming interdepartmental working groups to analyze the effectiveness of the current policy and propose changes based on the latest trends and best practices in the field of sustainability.
- **Stakeholder consultation:** To ensure that the reviews reflect a comprehensive understanding of the needs and expectations, the Group may propose consultations with relevant interested parties.

13.2. Updating the policy according to internal and external developments

ROMCARBON GROUP is prepared to engage in a dynamic process of updating its Social Responsibility Policy, ensuring that it remains abreast of internal and external developments, such as:

- **Changes in legislation and standards:** Updating the policy to reflect any changes in national and international legislation, as well as changes in sustainability standards and best practices.
- **Feedback and added value:** Integrating lessons learned from policy implementation and stakeholder feedback to continuously improve the effectiveness and applicability of the policy.

Through this review and updating process, ROMCARBON GROUP demonstrates its commitment to social responsibility, ensuring that its policy remains relevant, effective and aligned with the highest standards and expectations of stakeholders.

13.3. Policy Approval and Communication

This policy and any changes to it are subject to approval by the Board of Directors and will be communicated to the workforce and interested parties.

The policy comes into force from the date of its approval, it will be posted on the website www.romcarbon.com and is implemented through the specific procedures of the companies that are part of the ROMCARBON GROUP.

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