



# Human Rights and Labour Policy

Applicable to: All employees and collaborators

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# Introduction

Sterling is committed to respecting the human rights of all employees by promoting a working environment in which individual human rights are recognised and upheld, and a consistent global approach is taken.

We aim to provide a safe and inclusive workplace where people feel empowered to achieve their full potential. We promote openness, dignity, and equality of opportunity for everyone. This policy is guided by:

- the UN Universal Declaration of Human Rights,
- the UN Guiding Principles on Business and Human Rights,
- the UN Global Compact,
- the UK Modern Slavery Act 2015,
- and relevant EU and Polish labour laws.



# Scope

This policy applies to:

- all employees of Sterling,
- majority owned subsidiaries and joint ventures where Sterling has management control,
- contractors and third parties working on behalf of, or representing Sterling



# Policy Commitments



## Forced or Compulsory Labour and Human Trafficking

We strictly oppose and do not tolerate the use of forced, bonded, or involuntary labour, or any form of human trafficking - whether in our business or supply chain.

## Child Labour

We do not tolerate the employment of children. Sterling adheres to the minimum age of employment as defined by local law and International Labour Organization (ILO) standards.



# Policy Commitments



## Health and Safety

We strive for zero injuries and a workplace that supports physical and mental wellbeing. We promote a culture of safety through campaigns, training, and continuous improvement.

## Freedom of Association and Collective Bargaining

Sterling fully respects the right of employees to join trade unions or other representative organisations as applicable per local legislations. We prohibit any intimidation or retaliation related to such participation.



# Policy Commitments



## Non-Discrimination, Harassment and Abuse

We are committed to a work environment free from discrimination, bullying, or abuse. Every employee will be treated with respect, fairness, and dignity. Equal opportunities in recruitment, development, and promotion are ensured.

## Remuneration

Wages and benefits must meet or exceed national legal minimum standards and support the essential needs of employees and their families. Employees will be clearly informed about their pay and benefits.



# Policy Commitments



## Working Hours

We comply with all legal requirements regarding working hours and rest periods. We respect local labour regulations and promote a healthy work-life balance.

## Security Arrangements

Where private or public security services are used, Sterling ensures alignment with the Voluntary Principles on Security and Human Rights. The safety of employees and respect for their rights are priorities.



# Governance and Accountability



- The Sterling Board of Directors holds ultimate responsibility for this Policy
- The Risk, Compliance and Legal Manager is responsible for implementation, monitoring, and reporting.
- Reports will be submitted to the Board in cases where human rights concerns affect the business.

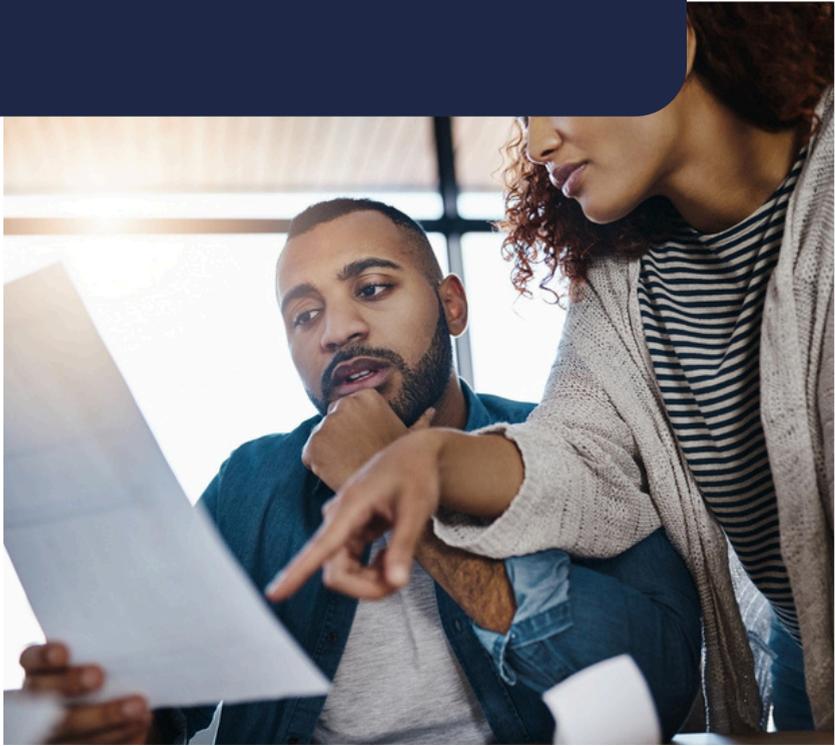
Our progress will be shared through internal updates and, where required, in Modern Slavery Statement and corporate communications.



# Speak Up

All employees, suppliers, and stakeholders are encouraged to Speak Up if they witness or suspect a violation of this policy.

Reports can be made confidentially and without fear of retaliation. Sterling guarantees no one will be penalised for reporting in good faith.





## Implementation

This policy was approved by Sterling CEO on June 11<sup>th</sup> 2025 and will be reviewed regularly and updated as needed. It will be supported by internal communication and training.



## Useful contacts



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[HRsupport@sterling-outsourcing.com](mailto:HRsupport@sterling-outsourcing.com) HR

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[Compliance@sterling-outsourcing.com](mailto:Compliance@sterling-outsourcing.com) Risk, Compliance and Legal

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[LetUsKnow@sterling-outsourcing.com](mailto:LetUsKnow@sterling-outsourcing.com) For Whistleblowers

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# THANKS

[www.sterling-outsourcing.com](http://www.sterling-outsourcing.com)