



## **Cabka N.V. Human Rights and Working Conditions Policy**

### **I. Foreword**

The Cabka N.V., listed at Euronext Amsterdam since March 1, 2022, with its subsidiaries in Western Europe and North America (together "Cabka"), is in the business of recycling plastics from post-consumer and post-industrial waste, transforming them into innovative reusable transport packaging, like pallets- and large container solutions, thereby enhancing sustainability of the logistics chain. Cabka is well known for its high-quality innovations, sustainable products and production processes, and for its diversity and for its pioneering and inventive spirit.

Business can only flourish in societies where human rights are protected. We as Cabka recognize that business has the legal responsibility to respect human rights and, in the meantime, the ability to affect people's enjoyment of their human rights positively. Human rights make good business sense. Cabka has developed this Human Rights Policy and Working Conditions Policy (hereinafter "Policy") above all because that is the 'right' thing to do.

The Policy sets out the principles for our actions and behaviors in relation to human rights. We are working to guard against being complicit in human rights violations and to uphold the human rights of our people and any other individuals that we are in contact with, either directly or indirectly. This Policy applies to Cabka (including its divisions, operations, subsidiaries, or greater than 50% owned joint ventures), Cabka's directors, statutory auditors, managers and employees.

Cabka is committed to the continuous and cooperative development of this Policy and will review this Policy on an annual basis to reflect evolving best practice, employee feedback, and legal requirements.

This policy should be read in conjunction with the Cabka N.V. Environmental Policy, Cabka N.V. Code of Ethics, Cabka N.V. Health & Safety Policy, and Cabka N.V. Diversity Policy.

### **II. Our Aim: Promote and Respect for Human Rights**

Cabka's primary goal is to create opportunities for a sustainable future. This involves actively engaging with stakeholders to ensure that all efforts are aligned with applicable laws and regulations. By prioritizing critical topics such as Environmental, Social, and Governance (ESG) issues, ethical conduct, innovation, human rights, diversity and inclusion, supply chain integrity, employee wellbeing, and equality, Cabka aims to drive positive change and uphold the highest standards across all operations.

Cabka endorses the international human rights principles set out aimed at promoting and protecting human rights, including the United Nations Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. Cabka adheres to the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational



Enterprises. Therefore, Cabka's ambition is to always respect individuals and operate with due diligence to avoid becoming involved in violations of human rights, including breaches on decent working condition.

We aim to have zero violations on human rights and always provide decent working conditions. Cabka aims to ensure a diverse and inclusive workplace to help drive business growth through balanced decision making and ensure equal opportunities within Cabka. With this, we are continuously working to increase diversity levels.

We expect all of our suppliers and business partners to share our human rights and working condition commitments. All suppliers must therefore adhere to Cabka's Code of Conduct for suppliers.

### **III. Our Human Rights Commitments**

Our statements below draw upon the ILO Declaration on Fundamental Principles and Rights at Work and UK's Modern Slavery Act:

#### **1. Exclusion of Forced and Child Labor**

We will not use child labor and will comply with all relevant laws in this regard. Child labor must not be used in any phase of production. We do, however, support legitimate workplace apprenticeships, internships and other similar programs that comply with the applicable laws and regulations. Where a young worker is employed, the best interest of the young worker shall be primary consideration.

#### **2. Modern Slavery and Human Trafficking**

We will not use forced, bonded or involuntary prison labor. All work must be voluntary, and employees must be able to terminate their work or employment at any time. In addition, workers must not be subject to unacceptable treatment such as psychological hardship, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. Workers are not required to lodge deposits or identity papers with the firm and can leave after giving reasonable notice, with all wages owed to be paid. We have a zero-tolerance approach towards human trafficking.

#### **3. Rights of Minorities and Indigenous Peoples**

Cabka recognizes and respects the inherent rights of minorities and Indigenous Peoples, as outlined in international frameworks such as the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and ILO Convention No. 169. We are committed to ensuring that our operations and value chain do not contribute to the marginalization, discrimination, or displacement of these communities. We acknowledge the unique spiritual, cultural, and economic relationship Indigenous Peoples and local communities have with their lands, territories, forests, and waters.

Accordingly, we commit to not engaging in or supporting activities on Indigenous or minority lands without obtaining their free, prior, and informed consent. This includes water sources and forested



areas critical to livelihoods, culture, and identity. We will avoid land acquisitions that could undermine the legitimate tenure rights of Indigenous Peoples and local communities. Furthermore, Cabka opposes all forms of forced evictions in connection with our operations, or supply chain activities.

#### **4. Equal Treatment**

We reject any form of discrimination. No one must be discriminated against based on their race, color, ethnicity, gender, religion, disability, sexual identity, age, worldview, or political opinion. Cabka is deeply committed to diversity. Harassment of any kind has no place in Cabka.

#### **5. Health and Safety at Work**

We are committed to providing our workers a safe and healthy working environment that meets or exceeds applicable local laws and industry standards for safety and occupational health.

#### **6. Freedom of Association and Collective Bargaining**

Companies should allow workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment. Cabka respects employee rights to associate freely, to join or not join labor unions, bargain collectively, seek representation, and join workers' councils in accordance with local law.

In line with our commitments under ILO Conventions 87 (Freedom of Association) and d98 (Right to Organise and Collective Bargaining), the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the national labor laws in the countries in which we operate, Cabka promotes an open, respectful, and continuous dialogue between employees and management at all levels.

Good internal communication and cooperation between management and employees is crucial for Cabka's ability to succeed and for the well-being of employees. Cabka has established multiple channels for effective communication and participation, including employee feedback surveys, formal grievance mechanisms, internal communication tools, and the representation of employees in panels focused on health and safety, sustainability, and other workplace matters. All employees should have the opportunity to become informed about Cabka's strategy and progress.

Cabka aims to continuously improve and develop these channels and mechanisms. We are committed to ensuring that dialogue is inclusive, constructive, and carried out in good faith, with particular attention to maintaining confidentiality and protecting individuals who raise concerns or other feedback. No employee shall face retaliation or adverse treatment for participating in social dialogue or voicing concerns.

We are committed to tracking the effectiveness of our social dialogue mechanisms through regular assessments and employee surveys. Outcomes of these efforts will be included in our annual sustainability reporting.

## **7. Wages and Benefits**

We recognize that fair compensation is fundamental to a decent work environment. We are committed to ensuring that all of our employees, across all entities, receive wages and benefits that meet or exceed the legal minimum, industry standards, or living wage benchmarks. This includes regularly reviewing and adjusting remuneration to reflect market averages for similar roles. We are also committed to maintaining pay equality, ensuring that all employees, regardless of gender, are compensated fairly for equal work. Additionally, we fully comply with the terms of any legally binding collective agreements, ensuring that they are implemented without exception.

## **8. Working Hours**

Cabka complies with all applicable local laws regulating working and resting hours and maximum consecutive days of work. We make sure that hours worked beyond the normal work week are voluntary, unless a collective bargaining agreement allows for required time under certain conditions and /or, if lawful in exceptional circumstances.

## **9. Career and Training**

All employees should be provided with the opportunity to contribute to Cabka's value creation. Cabka aims that its employees develop their personal and professional competencies over time. All employees receive regular feedback on the quality and performance of their work. Cabka provides regular trainings on human rights and ethical conduct to ensure staff understand and apply the principles laid out in this policy.

## **10. Diversity and Inclusion**

Cabka recognizes that differences in skills, experience, background, nationality, age, race, gender, sexual orientation, religious beliefs, physical ability and other characteristics of people are important and enable the Boards as well as Cabka as a whole to look at issues and to solve problems in a different way, to respond differently to challenges and to take more robust decisions. A dedicated Diversity Policy outlines how we address this topic on management level.

## **IV. Grievance and Remediation**

We place importance on the provision of effective remedy wherever employees' rights have been found to have been negatively impacted. Any breach of human rights witnessed must be reported by our employees within the framework of the whistleblower procedure as described in our Whistleblowing Policy as published on the Cabka's website.

All Cabka employees are responsible for complying with the Policy. The Cabka Management Board has approved this Policy on October 01, 2025. The Management Board is responsible for ensuring adherence to the commitments in this Policy.

Amsterdam, October 01, 2025



Alexander Masharov

**Alexander Masharov**  
CEO  
Cabka N.V.