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PRECISION  
IMPACT

# Human Rights Policy

## Purpose

This Human Rights Policy outlines Haifa Group's unwavering stance against any form of human rights abuse and affirms our dedication to cultivating a workplace rooted in integrity, responsibility, and openness. Inspired by our core value of COMPASSion, we apply these principles across all our business activities and interactions. This policy establishes the standards, values, and oversight structures necessary to proactively prevent, identify, and respond to human rights issues, offering clear guidance for managing related matters.

### Focus Areas:

- Our commitment to preventing human rights violations
- The guiding principles for safeguarding human rights
- Haifa Group's mechanisms for preventing, detecting, and addressing human rights concerns

## Our Commitment

Haifa Group is a global company, comprising of various subsidiaries around the world and operating an extensive supply chain that spans multiple regions worldwide. Given our broad international presence, we are committed to upholding the highest standards of integrity, respect, and responsibility in all our business activities, in accordance with the diverse human rights regulations and expectations of every country in which we operate. Respect for human rights is a core commitment of how we do business. Our Human Rights Policy is designed to ensure compliance with globally recognized human rights frameworks - including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labor Organization (ILO) Core Conventions, the European Sustainability Reporting Standards (ESRS), as well as relevant national and regional laws and regulations.

This Human Rights Policy complements our General Code of Conduct and Suppliers' Code of Conduct. Together, these documents guide our commitment to ethical, responsible, and human rights-centered business practices. We encourage regular review of these codes to ensure they address the full spectrum of human rights, including, but not limited to, labor rights, non-discrimination, freedom of association, privacy, and protection from harassment. This policy applies across all regions. Our aim is to embed respect for human rights throughout our global supply chain and operations, supporting well-being of our own workforce, our value chain workers, growers using our products as well as the communities we impact.



## Our Principles

This section details the core values and ethical guidelines that shape Haifa Group's commitment to human rights. These guiding principles act as our ethical benchmark, ensuring our conduct consistently adheres to legal obligations as well as globally accepted human rights standards.

- **Respect for Human Rights:** We are committed to respecting all internationally recognized human rights, as outlined in the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. We strive to prevent, mitigate, and address any adverse human rights impacts connected to our operations or supply chain.
- **Zero Tolerance for Discrimination and Harassment:** We strictly prohibit discrimination, harassment, and abuse in any form, whether based on race, color, gender, age, religion, nationality, sexual orientation, disability, or any other protected characteristic. We foster a diverse, inclusive, and respectful workplace.
- **Safe and Healthy Working Conditions:** Safety is a core part of our organizational culture. We provide a safe and healthy working environment for all employees and business partners, proactively identifying risks and preventing accidents. Senior management is obligated to safety and ensures compliance with all legal and professional standards at all levels and during all time and allocates the necessary resources. We strive for continuous improvement by setting measurable goals and learning from every incident, believing that safety is a shared responsibility throughout the organization. Our success is based on personal responsibility, an overall commitment and full cooperation of every Haifa employee and contract staff member. We believe safety is a shared responsibility.
- **Fair Labor Practices:** We uphold fair labor standards, including the right to fair wages and reasonable working hours. We do not tolerate forced labor, child labor, or any form of modern slavery within our operations or supply chain.
- **Freedom of Association and Collective Bargaining:** We respect the rights of employees and workers to freely associate, join organizations of their choosing, and engage in collective bargaining, in accordance with local laws and international standards.
- **Privacy and Data Protection:** We safeguard the privacy and personal data of our employees, business partners, and other stakeholders, ensuring that information is collected, processed, and stored in compliance with applicable data protection laws.



- **Grievance Mechanisms and Non-Retaliation:** We will provide accessible channels for raising concerns or reporting potential human rights violations. We are committed to investigating all complaints promptly and thoroughly, and we prohibit retaliation against anyone who raises a concern in good faith.
- **Responsible Sourcing and Supply Chain Due Diligence:** We expect our suppliers and business partners to uphold these same human rights standards as mentioned in the supplier code of conduct. We will conduct due diligence to identify, prevent, and address human rights risks throughout our supply chain.
- **Community Engagement and Social Responsibility:** We engage with local communities and stakeholders, and we strive to contribute positively to the societies in which we operate.

## Resources and Implementation

Haifa Group is committed to preventing, identifying, and addressing human rights risks and impacts across our global operations and supply chain. We understand our responsibility for Human Rights adherence has much wider boundaries than our own operations. Therefore, we have established robust risk-based mechanisms and processes to ensure our human rights commitments are embedded in day-to-day business practices.

### Prevention

- **Risk-Based Human Rights Due Diligence:** We assess potential inherent human rights risks before engaging with new suppliers, partners, or entering new markets. Enhanced due diligence is applied in areas of high inherent risks or for suppliers operating in sectors which are exposed to higher Human Rights risks. Such due diligence process is intended to identify prevention and mitigation procedures applied by suppliers to decrease residual Human Rights risk. Due diligence results are embedded into our decision-making process when engaging new suppliers or renewing existing engagements, along with other social, quality, commercial considerations and environmental expectations.
- **Clear Internal Policies and Codes:** Our Human Rights Policy, Code of Conduct, and Supplier Code of Conduct set clear expectations for behavior and decision-making. These documents are regularly reviewed and made accessible to all employees, suppliers, and relevant stakeholders.



- **Supplier Engagement and Capacity Building:** We will communicate our human rights expectations to suppliers and provide guidance and resources to help them meet our standards. Our main Human Rights expectations are included in the Suppliers Code of Conduct which is sent to each new contract and with every purchase order.

## Detection

- **Risk-Based Evaluation of Questionnaire Responses** Supplier responses to the due diligence questionnaire will be reviewed and categorized by risk level:
  - Low Risk:** Meets standards and/or of low inherent risk according to region; approved for continued engagement.
  - Medium Risk:** Minor gaps; corrective actions required and monitored.
  - High Risk:** Significant risks; subject to enhanced review and, if necessary, consideration of further actions, which may include suspension or termination if issues are not addressed adequately.
- **Establishment of Grievance Mechanisms:** We are setting up accessible and confidential channels for employees, suppliers, and stakeholders to report human rights concerns or violations.
- **Ongoing Monitoring:** As our program matures, we will periodically reassess suppliers and update our risk assessments based on new information or reported concerns. We will further introduce periodic supplier audits on Human Rights and other social and environmental expectations.

## Accountability

- **Clear Response Protocols:** All reported concerns and questionnaire findings will be logged, reviewed, and acted upon according to defined thresholds. Corrective action plans will be required for medium and high-risk findings, such as employee training, policy updates, enhanced monitoring, provision of up-to-date certifications, replacement of subcontractors or personnel, or submission of periodic progress reports. Suppliers unwilling to address significant issues may face suspension or termination.
- **Whistleblower Protection:** We strictly prohibit retaliation against anyone who raises human rights concerns in good faith.
- **Continuous Improvement:** We will regularly review and refine our due diligence process, risk thresholds, and response measures as we gain experience and feedback.



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