



Human Rights policy

Approved by Management Committee on 2026/06/15.

Note: This policy is released in English. In case of divergence between the English version and other translated versions, the English version will prevail.

Scope

This policy applies to **all employees of Adhex Group's entities and to all our suppliers and subcontractors** including their affiliates. We strongly encourage our suppliers to promote the commitments of this policy within their own supply chain.

Index

1. Introduction
2. Purpose
3. Articulation with national laws
4. Our risks-based approach
5. Our commitments in terms of Human
6. How do we implement it in our business
7. Governance and communication
8. Monitoring and review
9. References

1. Introduction

Adhex is a market leader in technical adhesive solutions and stands as an active promoter of ethics and sustainability in all its forms. In support of these goals, which are materialised by our commitment towards the 10 principles of the United Nations' Global Compact, the United Nations Development Goals, amongst others, Adhex respects the Human Rights (referring to the United Nations Universal Declaration of Human Rights) and expects its suppliers to do so too by accepting and following the Adhex Code of Business Conduct for Suppliers.

"our ambition is to be a worldwide reference as a sustainable industrial company, a responsible employer and an innovative producer of special adhesives. Adhex is ready to take on its responsibilities with determination. This is the Adhex way of doing things right."



Roland de la Brosse

President of Adhex Group

2. Purpose

Respect for Human Rights is rooted in the core values embodied by Adhex. Our Human Rights policy is founded on **our 3 Principles of Action**:

- **integrity**
- **the pre-eminence given to respect for the human person**
- **trust**

and **our 4 core values**:

- **Customer focus**
- **Team spirit**
- **Technical creativity**
- **Persistence**

which define our vision of a socially responsible company.

The Adhex Code of Ethics applies to all employees and is shared with our customers and stakeholders. We cascaded it into a dedicated Code of Business Conduct for our suppliers and subcontractors.

Through these Principles, we are committed to respecting human rights in accordance with the international standards and to taking necessary measures to identify and manage existing or potential negative impacts related to our operations or to our value chain.

Purpose

This Human Rights policy and associated practices set out the principles of actions and behaviour in relation to human rights to make of Adhex a responsible actor in its environment. This policy states our position on human rights protection, defines a foundation of commitments and help ensure that we do not engage in activities that directly or indirectly violate human rights.

It also responds to stakeholders' expectations for more transparency.

3. Articulation with national laws

Generally, Adhex entities respect the national law of the countries where we conduct our activities. In matters of human rights, between this Policy and the rules derived from national law or local norms, we prioritise the most protective standards.

In the case where the application of this Policy would lead to the violation of a national law provision, solutions must be sought to come as close as possible to the spirit of the Policy.

4. Our risks-based approach

Our general commitments

We signed the United Nations Global Compact. Our Principles of Conduct and Action explicitly refer to the relevant International Labour Organisation conventions and the International Bill of Human Rights. We have committed to respecting the United Nations' Guiding Principles on Business and Human Rights. Our Principles of Action in particular make direct reference to them.

The implementation of these commitments is founded on our three principles of conduct, both individual and collective, which comprise the second and complementary set of our four core values.

The application of these commitments is reflected in our **3 Principles of Action**, which define both our individual and collective actions inside the organization and are led and supplemented by our **4 core values**.

Our risks-based approach

The Human Rights Policy follows a risk-based approach.

It entails creating a mapping aimed at identifying and assessing the risks related directly or indirectly to our operations. Relevant and appropriate methods for

minimising these risks and repairing any potential harm or existing negative impacts are developed depending on the countries where we or where our partners operate.

We are aware that human rights risk assessment cannot be frozen in time and that the effective management of potential negative impacts requires a constant and transparent dialogue with the stakeholders involved.

This vigilant approach represents the Adhex's commitment to human rights while actively preventing and managing major harm risks.

We identified the following key human rights areas of application as priorities for our operations and along our value chain.

They represent potential risks to be detected during the due diligence process:

Risks	Value chain	Quotation (gravity x likelihood)	Relevant law	Our commitments (referring to below sections)
Work accidents, exposure to solvents/VOCs	Own operations	High	Right to health and safety	Safety, health, and security
Product safety (automotive, medical)	Downstream	High	Right to health and consumer safety	Product safety (automotive, medical)
Failure to exercise due diligence regarding human rights	Entire value chain	High	Right to an effective remedy	Ethical business conduct
Forced labour or child labour at suppliers	Upstream	Medium/High	Prohibition of slavery and forced labour	Forced labour and child labour
Environmental impacts affecting communities	Own operations + Neighbourhood	Medium/High	Right to a healthy environment	Affected communities
Corruption, conflicts of interest, reprisals whistleblowers	Entire value chain	Medium	Right to an effective remedy	Ethical business conduct
Discrimination, wage inequalities, harassment	Entire value chain	Medium	Right to equality and non-discrimination	Inclusion, combating discrimination, harassment
Excessive working hours, insufficient wages	Own operations + Upstream	Medium	Right to fair working conditions	Working hours, compensation and Benefits
Violation of union freedom and social dialogue	Own operations	Low/Medium	Freedom of association	Freedom of association, collective bargaining, and employee expression

The above cartography is referring to the Declaration of Fundamental Human Rights, the United Nations Guiding Principles, the International Labour Organisation's (ILO), the international Organisation for Economic and Co-Operation and Development (OECD).

All these potential risks are considered in the Principles of Conduct and in the Code of Ethics for our own employees, and in the Code of Business Conduct for our suppliers.

5. Our commitments in terms of Human Rights

Safety, health, and security

In accordance with ILO Conventions No. 155 and No. 187, Adhex commits to providing all employees and on-site workers under its responsibility with a healthy and safe work environment, as well as conditions for performing their tasks that preserve their physical and mental integrity.

The risks related to health and safety and to the environment are addressed through a specific policy.

Our goal is clear to everyone: we want to achieve zero accidents in each of our production plants. To do this, we want to ensure that all our near-miss situations are addressed through corrective and preventive actions, and that we monitor particular indicators daily, such as accidents frequency rate.

Forced labour and child labour

In accordance with ILO Conventions No. 29 and No. 105, Adhex condemns all forms of forced labour, defined as any work or service required from an individual under any form of constraint and for which the said individual does not participate of their own free will.

It is characterised notably by a restriction of freedom of movement, coercion (for example, a debt), the absence of the worker's free consent, or a situation of isolation.

In accordance with ILO Conventions No. 138 and No. 182, Adhex condemns all forms of child labour that deprive children of their childhood, potential, and dignity, their education, and hinder their physical and mental development.

Inclusion, combating discrimination, harassment

In accordance with ILO Conventions No. 111, No. 100 and No. 190, Adhex is committed to ensuring that all employees have the right to a healthy work

environment that inspires trust and encourages dialogue. Any act of harassment, discrimination, and any inappropriate behaviour brought to the attention of a manager must be addressed appropriately. If applicable, they must be subject to an internal investigation. Conservative and/or disciplinary measures may be implemented, as well as, if necessary, legal proceedings, in consultation with the management and the human resources director.

Freedom of association, collective bargaining, and employee expression

The quality of the social dialogue within the group results from an approach actively contributed to by unions and employee representative bodies. In accordance with ILO Conventions No. 87 and No. 98, Adhex commits to guarantee a continuous social dialogue; to guarantee each employee's freedom of association and their right to collective bargaining.

Working hours

The following commitments aim at ensuring a decent working time for all employees and preventing any risk to their health. They must be implemented within all our entities.

- Set up an appropriate work organization.
- Respect local legislation on working hours and overtime.
- Grant break times during the workday. In any case, we commit to granting significant consecutive hours of rest per period of seven consecutive days, aligned with the local regulations, notably emergency situations, exceptional situations, or in cases of constraints related to the implementation of specific equipment or adjusted schedules, particularly during missions or rotations.
- Overtime hours are paid at the agreed or increased hourly rate, and their number cannot exceed the level set by local law.

Compensation and Benefits

The **Group's remuneration policy**:

- is based on the principle of fair and equitable compensation for all employees, who must be compensated according to objective criteria related to their position, competence, and performance, in accordance with ILO Convention No. 100.
- aims to ensure decent remuneration for all employees in the country where they carry out their activities, meaning it should cover, in the respective country, at least food, water, housing, education, healthcare, transportation, clothing, and other essential needs, including coverage for unforeseen events.

The remuneration of our employees at a minimum complies with the current national regulations, collective agreements, and company agreements negotiated with social partners when they exist.

Social benefits: Adhex ensure that social benefits comply at a minimum with current national regulations, collective agreements, and company agreements negotiated with social partners when they exist.

Paid leave and sick leave: Adhex grant paid leave and sick leave in accordance with local legislation if provided for.

Social protection: internationally, Adhex ensures that each employee benefits at a minimum from a health and care program, the minimum social coverage in case of parenthood and death, and its local variations.

Affected communities

Adhex respects the rights of the affected Communities. Attention must be paid to the impacts of the Adhex's activities on the affected communities, specifically regarding their access to a clean, healthy, and sustainable environment, which is essential for the enjoyment of all human rights.

Ethical business conduct

The risks related to the business ethics are addressed through our specific Code of business conduct.

Confidentiality and data protection

Adhex complies with all regulations related to the protection of personal data, particularly the European General Data Protection Regulation (GDPR) wherever it is applicable.

In countries where the General Data Protection Regulation (GDPR) is not applicable, Adhex apply local regulations while ensuring, as much as possible, a comparable level of protection.

Each Adhex' affiliate applies the relevant standards in this area and ensures the protection of personal data of its employees, suppliers, subcontractors, and customers, collected in the course of its activities.

6. How do we implement it in our business

Responsibility for the implementation

Responsibility for the implementation of this Policy lies with the most senior manager responsible for each department. The managers will report on any human rights hotspots arising within our operations or our supply chain to the CSR Committee and to the Management Committee at least on a yearly basis.

Training

We commit to train our most exposed employees and managers in the identification and management of risk situations in an open dialogue with potentially impacted stakeholders.

The Human Resources department and the CSR manager have accordingly set up training programs for our employees to ensure that everyone understands them and that they are effectively implemented by those responsible for managing the relevant operations.

Some of these programs may be open to partners, particularly to our suppliers and subcontractors who have signed the Code of Business Conduct for our suppliers.

7. Governance and communication

Governance

This policy is presented by the President of Adhex and by the Head of Human Resources to the Management Committee.

Each plant's manager is responsible for ensuring compliance with and promotion of the Principles of Conduct and Code of ethics in the country/countries under his/her responsibility. He/she is also in charge of implementing the human rights policy for our activities and local partners.

The measures implemented within the framework of our Responsible Procurement consider human rights risks. The Group's Purchasing Department is responsible for its implementation.

The CSR Committee oversees the respect of human rights within the Group.

Additional support from the network of local CSR representatives

The CSR manager can count on the Adhex network of local CSR representatives

- to identify situations particularly at risk in terms of human rights, including and as much as possible concerning temporary workers, subcontractors, and suppliers
- to deploy the commitments of this Policy daily
- to support the action plans coordination when risks to human rights are identified
- to report information related to current best practices

Communication

We are committed to communicating our progress and challenges in a regular and transparent manner.

Communication on severe cases

In the event of significant violations of human rights or ethics, as well as environmental violations and hazards (such as pollution, floods, and so on), or in the event of any breach of this Policy, we expect our stakeholders and each individual to notify us promptly, to collaborate with communities to minimise local impacts, and to inform us about Adhex's ability to comply with its own commitments.

A professional alert system is in place to collect reports of negative impacts. See our whistleblowing line: <https://whistleblowing.adhex.com/>

Note: No discriminatory measure or disciplinary sanction may be taken against a whistleblower who has made a report in good faith and without financial compensation.

8. Monitoring and review

Monitoring

This policy forms an integral part of Adhex's policies management and is submitted to our internal evaluation procedure which includes the follow-up of performance indicators. It is based on a process of continuous improvement.

Review

Adhex will periodically review this policy and the implementation programme, with respect to its suitability and effectiveness. It is therefore subject to revision from time to time as necessary.

9. References

Adhex references

- Adhex Code of Ethics
- Adhex Code of Business Conduct for suppliers
- Adhex Human Resources policy
- Adhex Health, Safety and Environmental policy

International references

- United Nations Universal Declaration of Human Rights | <https://www.un.org/en/about-us/universal-declaration-of-human-rights>
- United Nations' Human Rights Charter | [udhr booklet en web.pdf](#)
- United Nations' Global Compact | [The Ten Principles | UN Global Compact](#)
- International Labour Standards | [International Labour Standards | International Labour Organization](#)
- The International Labour Organisation's (ILO) Declaration of Fundamental Principles and Rights at Work | <https://digitallibrary.un.org/record/1491423>
- United Nations Sustainable Development Goals | [THE 17 GOALS | Sustainable Development](#)