



HUMAN RIGHTS POLICY

Our Values



**CELEBRATE
INDIVIDUALITY**
Our differences
make us stronger



**ADAPT TO
GROW**
It's our nature
to evolve



**EMPOWER
AND GO**
The support to
reach beyond



**COLLABORATE
FOR SUCCESS**
We only win
as one team

February 2024

Human Rights Policy

Consistent with our Purpose, Vision and Values, we are committed to respecting human rights, and treating people with dignity and respect.

Our Policy is grounded in the following human rights standards:

- United Nations Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- International Labour Organisations Declaration on Fundamental Principles and Rights at Work

This Policy applies to Tirlán Ltd, where “Tirlán Ltd” is defined as all companies where Tirlán directly or indirectly controls more than 50% of the equity or has management control, and others acting on Tirlán’s behalf both at Tirlán facilities and Tirlán sponsored events. We also expect our supply chain partners to comply with the principles of this policy.

Our Commitment

Tirlán is committed to upholding international human rights and to acting with integrity in all of our dealings, relationships, and supply chains. We have a zero-tolerance approach to slavery and human trafficking and other human rights infringements. We are deeply committed to respecting and safeguarding the people who work for us and those who are affected by our activities.

We are committed to fully investigate and remedy any adverse human rights impact identified and take all such allegations very seriously.

Key Principles

Employees and other workers are:

- provided with a safe working environment.
- paid fairly and on time for the work they do.
- provided with working hours that comply with national laws and industry standards.
- (have) the right to freedom of association and collective bargaining.
- not subjected to any form of involuntary servitude or duress, such as having to repay large loans or having their passport retained.
- not discriminated against because of their gender, civil status, family status, sexual orientation, religion, age, disability, race membership of a minority community/group or any other status protected by applicable law.
- not subjected to physical, verbal, sexual, racial, psychological, or any other forms of abuse, bullying or harassment.
- not under the legal minimum age of employment, with a zero tolerance for the exploitation of children.
- provided with fair procedure and absence of discrimination in any grievance, disciplinary or other investigation or resolution process.

If there is a difference between the content of this policy and any local law or regulation, the more stringent requirement will apply.

How to Raise a Concern

Employees of Tirlán are required to report any breach of our policies, including any suspected breach of human rights. There are a number of avenues open to an employee in how to raise a concern (Refer to the Code of Conduct Section 2.2 'Who Should I Contact' for details), including use of our independent Speak Up telephone, email or online reporting facility 'Safe Call'.

For Non Employees

Any other person who believes a breach of human rights may have occurred or be occurring within our operations or our supply chain can contact the Safe Call line, details included within the Annex of this policy and also within our Code of Conduct.

Assessment and Due Diligence

To ensure compliance with our policies, we take the following steps to assess and monitor potential risks within our operations and supply chain:

- Independent audits of our operating sites through the Tirlán Risk Management Process.
- Mitigate against the risk of human rights breaches including slavery and human trafficking by following the Tirlán Procurement Policy requirements and third-party review of supplier analysis such as Ecovadis.
- Facilitate, without fear of recrimination, our people in reporting any concerns in relation to human rights infringements within Tirlan operations or supply chain and ensure appropriate oversight and actions are implemented for each incident raised.
- Deployment of appropriate training and communication to our employees to support them in executing their role to ensure Tirlán's commitment to upholding human rights and combatting human rights breaches.

Enforcement

We will ensure fair procedures in any grievance or disciplinary process and uphold the principles set out in this policy.

Violation of this Policy or the refusal to co-operate will result in disciplinary action up to and including termination and referral to the appropriate authorities. We reserve the right to cease relationships with suppliers who infringe this Policy as warranted.

References

This policy reinforces other relevant policies including the Code of Conduct, Supplier Code of Conduct, Diversity and Inclusion policy and supports our Modern Slavery and Human Trafficking Statement, all of which are available on tirlan.com.

For further information regarding human rights, please refer to:

[United Nations Universal Declaration of Human Rights](#)

[United Nations Guiding Principles on Business and Human Rights](#)

[International Labour Organization Declaration on Fundamental Principles and Rights at Work](#)

Annex



Contact Safecall, an Independent Service for Raising Concerns

If you have a concern about a legal or ethical issue and are not comfortable using one of the standard internal methods, you can contact Safecall, an independent service for raising concerns.

You can use the following Freephone numbers:

Country	Phone Number
China (Shanghai, Suzhou, Beijing)	10800 7440605 (China Unicom/Netcom) 10800 4400682 (China Telecom)
France	00 800 72332255
Germany	00 800 72332255
Ireland	1800 812740
Japan	0120 921067
Netherlands	00 800 7233 2255
Northern Ireland	0800 9151571
Singapore	800 4481773
UAE	8000 441 3376
United Kingdom	0800 9151571
USA	1 866 901 3295
Vietnam (Viettel)	122 80725

Abbey Quarter
Kilkenny
R95 DXR1
Ireland
T: +353 56 779 6300