



LABOUR & HUMAN RIGHTS POLICY

Sonae Arauco places people at the heart of its success. Our ultimate goal is to foster a culture of excellence by building a team of highly skilled, motivated, and empowered individuals who uphold the highest standards of personal and business ethics. We are committed to ensuring that we leave behind a stronger, and more sustainable company for future generations.

COMMITEMENT TO LABOUR & HUMAN RIGHTS

Sonae Arauco is dedicated to keeping the highest standards of Labour and human rights across all its operations. These principles guide our relationships with employees, shape our engagement with communities and customers, and define our expectations for suppliers.

We are committed to ensuring respect for human rights following the United Nations Guiding Principles on Business and Human Right and the Universal Declaration of Human Rights.

SCOPE

This policy applies to all Sonae Arauco entities (including Joint Ventures owned by more than 50%), emphasizing respect for human rights not only within our business but also across our supply chain. We collaborate with suppliers, clients, and business partners to uphold these principles. It encompasses all aspects of labour and human rights, ensuring fair treatment, ethical labour practices, and respect for human dignity.

KEY PRINCIPLES

In line with the principles outlined in the Code of Ethics and our commitment to respecting labour and human rights, Sonae Arauco is dedicated to promoting and safeguarding the following rights:

- **Prohibition of Child Labor**

We strictly prohibit the employment of child labour. The minimum hiring age is the one allowed by law in each country, and for hazardous work, we impose a minimum age of 18 years.



- **Elimination of Forced and Compulsory Labour**

We prohibit all use of forced labour, including slave, bonded, compulsory or any form of human trafficking.

All employment relationships must be based on free choice, and employees must have the right to end their employment voluntarily with reasonable notice.

- **Fair Wages and Benefits, Working Hours and Rest Periods**

Workers must receive fair compensation in accordance with national laws, industry standards, and local labour markets, as well as any applicable collective bargaining agreements. Employee compensation must meet or exceed the legally required minimum standards.

We ensure that wages, working hours, and benefits fully comply with national regulations and industry best practices. Overtime is compensated - according to applicable labour laws, company and/or bargaining agreements, and all workers are entitled to mandatory rest periods and designated days off.

- **Freedom of Association and Collective Bargaining**

Employees have the right to freely associate, form, and join trade unions, as well as engage in collective bargaining without fear of retaliation.

We respect all applicable labour laws about union representation and workers' rights.

- **Non-Discrimination and Equal Opportunity**

We prohibit discrimination based on race, gender, age, religion, disability, sexual orientation, political opinion, or any other characteristic protected by law.

We are committed to fostering a workplace culture that upholds diversity, equity, and inclusion in all aspects of employment and business operations.

- **Health, Safety, and Well-being**

We are committed to keep a secure, safe, and healthy workplace. We issued the Sonae Arauco Integrated Policy, that comprises our commitments on occupational safety, health and well-being.



- **Prevention of Harassment and Abuse**

We do not tolerate any form of harassment, abuse, or intimidation in the workplace.

We ensure mechanisms for employees to report violations confidentially and without retaliation.

- **Career Management and Training**

We invest in continuous professional development by providing training programs and career advancement opportunities.

Employees are encouraged to engage in lifelong learning and skill enhancement to support both personal growth and business success.

We work towards fostering an inclusive and dynamic workplace that supports talent development and leadership growth.

- **Suppliers Engagement**

Sonae Arauco adheres to and actively promotes sustainable business and expects the same applies to its suppliers.

This involves strict legal compliance, the highest ethical standards of professional conduct and positively impacting society by minimizing the social and environmental consequences of business activities. Sonae Arauco invites all our high-risk (as per sustainability risk matrix output) suppliers to commit with our Suppliers Code of Conduct.

WHISTLEBLOWING CHANNEL

Employees and stakeholders can confidentially report any concerns related to conduct, ethics, or legal compliance through the following email address: ethics.committee@sonaearauco.com.

We commit to investigating and addressing all reported violations promptly and transparently. All communications will be treated in the utmost confidentiality and measures will be taken to ensure the proper actions.

Anonymous communications are accepted only if supported by evidence of the matter being disclosed.



GOVERNANCE MODEL

Sonae Arauco Company's Labour & Human Rights Policy is sponsored by the Executive Committee, which is also responsible for monitoring the annual planning of measures to promote and ensure compliance with the policy.

The Human Resources team is responsible for proposing objectives to the Executive Committee and identifying best practices that can help the company achieve its commitments and targets.

The Executive Committee determines the necessary measures for promotion and ensuring compliance with this policy addressing any identified non-conformities.

The Risk Management & Internal Audit Department, together with the Sonae Arauco Management System regularly assesses and monitors compliance with this policy through the internal audits program.

The Ethics Committee is responsible for promptly and transparently investigating and addressing all reported violations and ensuring that all communications will be handled with the utmost confidentiality, and proper measures will be taken to ensure proper action.

POLICY REVIEW

The Human Resources Department, with the Sonae Arauco Management System, will assess periodically the adequacy of this policy, during the Management Review process, based on performance and changing circumstances. Updates will be communicated to interested parties.

23rd December 2025,

Approved and signed by:

A handwritten signature in black ink, appearing to read 'Rui Correia', is positioned above a horizontal line.

Rui Correia, Sonae Arauco CEO



ANNEX 1

SONAE ARAUCO LABOUR & HUMAN RIGHTS OBJECTIVES

At Sonae Arauco we are committed to maintaining the highest standards of Labour and human rights across our operations and supply chain.

Aligned with the principles outlined in our Labour and Human Rights Policy, we have established the following objectives to track our performance and monitor progress in upholding key human rights standards.

TARGETS

Prohibition of Child Labor

- 100% compliance with local minimum age laws in all operating countries.
- Zero reported and confirmed cases of child labour across our operations.

Non-existence of Forced and Compulsory Labor

- Zero tolerance policy: No reported and confirmed cases of forced or compulsory labour.
- 100% of employees provided with clear contracts ensuring voluntary employment.

Fair Wages and Benefits, Working Hours, and Rest Periods

- 100% compliance with national wage laws and applicable collective bargaining agreements.
- Conduct a living wage gap analysis against the living wage threshold in each country by 2026.
- Define and implement an action plan to ensure that 100% of employees earn the identified living wage by 2028.

Freedom of Association and Collective Bargaining

- 100% compliance with national laws regarding union representation.
- Zero reported and confirmed cases of retaliation against employees exercising their rights.

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Non-Discrimination and Equal Opportunity

- Zero reported and confirmed cases of discrimination across our operations.
- Monitor and ensure compliance with legal requirements on pay equity across all job levels by 2027.
- Zero reported and confirmed cases of discrimination in hiring and promotion decisions.

Health, Safety, and Well-being

- Targets defined in the Safety, Quality, Environment and Energy Integrated Policy for the safety indicators.

Prevention of Harassment and Abuse

- Zero tolerance for harassment: All reported cases investigated within 30 days.
- Zero harassment convictions.

Career Management and Training

- Completion of the Upskilling Program by 2026, in line with the plan.
- Completion of the Leadership Development Program, according to X Matrix KPI.
- Increase internal promotions to foster career growth.

Supplier Engagement

- Zero reported and confirmed cases of forced or compulsory labour.
- Zero reported and confirmed cases of child labour.
- Targets related with sustainable procurement defined in the Sustainable Procurement Policy.