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Adastra Global Human Rights Policy



1. Introduction

At Adastra, we are committed to conducting business ethically, responsibly, and with full respect for internationally recognized human rights. This policy reflects our values and responsibilities towards our employees, contractors, clients, business partners, and the communities we impact through our operations.

We base our approach on the **Universal Declaration of Human Rights**, the **International Labour Organization (ILO) Core Conventions**, the **OECD Guidelines for Multinational Enterprises**, and the **UN Guiding Principles on Business and Human Rights**.

Respect for human dignity and individual rights is foundational to who we are — not only as a company, but as a community of people working together globally.

This Policy applies to all Adastra employees, contractors, suppliers, and partners across all countries where we operate.

2. Our Commitments

2.1. Labour Rights and Fair Working Conditions

Prohibition of Forced and Child Labour: Adastra **does not use and tolerate forced or involuntary labour of any type** (e.g., forced, bonded, indentured or involuntary prison labour). All employment is based on free will and compliance with local legal standards. **We strictly prohibit child labour** as defined by applicable national laws. Adastra will not use child labour. The term "child" refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. We may provide suitable internships and entry-level positions for students and graduates. In line with national labour codes, Adastra always applies stricter local thresholds for minimum employment. For example, in Bulgaria the minimum age is generally 16 (15 only for light work with parental and labour inspectorate approval), and in Greece the minimum age is 15, with exceptions for artistic activities. Adastra ensures compliance with these requirements, even where international standards set lower thresholds.

Freedom of Association, Collective Bargaining, and Social Dialogue: Adastra fully respects the right of all employees to form and join trade unions, works councils, or other representative bodies of their own choosing, and to engage in collective bargaining, in line with applicable national laws and the International Labour Organization (ILO) Conventions 87 and 98.

At present, no formal employee representatives or collective bodies operate within Adastra. Should employees decide to establish such representation, we will:

- Recognize representatives chosen through fair and democratic processes.
- Maintain open, transparent, and constructive dialogue, addressing workplace matters in good faith.
- Ensure that no employee is subjected to retaliation, harassment, or discrimination for exercising their rights to freedom of association or collective bargaining.
- Provide clear and accessible communication channels to support ongoing social dialogue.
- Through this commitment, Adastra affirms its readiness to engage in collective processes if and when employees choose to initiate them.

Ethical Recruitment: Adastra conducts recruitment in **compliance with all applicable laws and with respect for human rights**. We base hiring decisions on fairness, equality, transparency, and respect for all candidates, ensuring non-discrimination and alignment with ethical and legal standards.

Health, Safety, and Non-Discrimination: Adastra ensures a safe, healthy, and non-discriminatory workplace in compliance with the stricter of local laws or international standards, supported by effective programs to prevent risks, promote well-being, and provide the same standards of health and safety in all company premises or facilities, including accommodation where applicable.

Fair Wages and Working Hours: Adastra complies with the stricter of local laws or international labour standards on wages and working hours, including minimum wage, overtime, and maximum hour regulations. We work towards remuneration levels that meet adequate living-wage benchmarks, ensure equal pay for work of equal value, provide legally mandated benefits, and pay on time with transparent wage statements. We prohibit excessive or unlawful deductions and guarantee at least one day of rest in every seven-day period. Where local laws differ from international standards, Adastra ensures compliance with national requirements while striving to uphold the higher standard to protect the dignity and well-being of employees.

2.2. Diversity, Equity & Inclusion

Non-Discrimination, Dignity, and Inclusion: We are committed to providing a work environment free from discrimination or harassment based on race, religion, age, nationality, ethnicity, sexual orientation, gender identity, social status, disability, or political belief. All employees are treated with dignity and respect. We do not tolerate intimidation, harassment, or degrading treatment under any circumstances.

Diversity, equity, and inclusion are integral to our culture and business practices. We value different perspectives and strive to create an environment where everyone feels seen, heard, and empowered to contribute.

Adastra has zero tolerance for violence, harassment, or any form of intimidation.

2.3. Healthy and Safe Work Environment

Adastra has zero tolerance for violence, harassment, or any form of intimidation.

All individuals have the right to be treated with dignity and respect in a safe working environment.

Adastra provides a safe and healthy work environment in compliance with all applicable laws. We ensure that all employees have access to necessary health and safety standards, and that potential risks are regularly monitored and addressed.

2.4. Psychological and Occupational Safety

We are committed to supporting both the physical and psychological well-being of our employees. We recognize the importance of occupational and mental health in creating a productive and respectful workplace. Therefore, we strive to provide an environment that promotes psychological safety, supports emotional well-being, and ensures that all individuals feel valued, empowered, and secure in their roles.

2.5. Education and Skills Development as a Foundation for Human Rights

We believe that access to education and continuous skills development are key pillars of human rights and essential for fostering personal and professional growth. At Adastra, we are committed to empowering our employees, partners, and communities by promoting lifelong learning initiatives, training programs, and equitable educational opportunities. Through this commitment, we aim to create sustainable progress and innovation that benefits society as a whole.

2.6. Environmental Stewardship

We recognize that environmental responsibility is connected to the rights of current and future generations. We are committed to complying with environmental laws and reducing our ecological impact across all operations.

2.7. Data Protection Governance

Adastra maintains a strong governance structure for data protection. A designated data protection officer (DPO) oversees compliance with privacy regulations, advises on risk management, and supports employees, clients, and partners in exercising their data protection rights. All employees handling personal data must follow internal policies and training to ensure accountability and transparency across our operations.

2.8. Digital Rights

As an artificial intelligence (AI) and data company, we recognize data protection and privacy as fundamental human rights. We comply with the GDPR, the ePrivacy framework, and other applicable laws by embedding privacy by design and by default in our solutions, conducting Data Protection Impact Assessments (DPIAs) where required, safeguarding data subject rights such as access, rectification, erasure and portability, and applying robust technical and organizational measures to protect personal data. In doing so, we uphold our ethical principles of transparency, fairness, and accountability in the development and use of data and AI technologies. We also design and deliver products and services with the safety of children and overall digital safety in mind.

3. Human Rights in Our Business Relationships

At Adastra, we understand that our responsibility to respect human rights extends beyond our internal operations. As a global data and digital consulting company, we work with a broad network of suppliers, contractors, technology providers, and business partners. These relationships play a vital role in shaping the social and ethical footprint of our services.

To ensure that our external business engagements are aligned with our values and human rights commitments, we:

- Conduct human rights due diligence to identify, assess, and respond to actual or potential risks in our value chain—particularly in high-risk geographies or sectors. Our approach includes preventive and, where necessary, corrective measures.
- Require our suppliers and partners to respect internationally recognized human and labour rights, such as the prohibition of forced labour and child labour, non-discrimination, fair working conditions, and the right to freedom of association.
- Promote awareness and capacity building by engaging with partners through clear communication, guidance materials, and training on human rights and ethical business conduct—particularly in the areas of labour standards, data privacy, and responsible technology use.
- Commit to responsible sourcing practices, especially concerning raw materials and in high-risk regions. We work toward transparent and traceable supply chains and support responsible sourcing initiatives.
- Engage ethically with local stakeholders. We are committed to minimizing any negative social or environmental impact and to fostering fair employment practices in all regions where we do business.

- Integrate digital ethics and human rights into the technologies we design, implement, or advise on—especially in the areas of data governance, artificial intelligence, and automation. We actively promote the responsible and transparent use of digital solutions that respect privacy, mitigate bias, and empower individuals and communities.

Digital rights in our value chain: We expect our suppliers, contractors, and partners to uphold digital rights by protecting privacy and freedom of expression, applying ethical AI principles, ensuring transparency and non-discrimination in algorithms and data use, and considering children’s protection and digital safety in their products and services.

Suppliers: We require commitment to our Supplier Code of Conduct, audit rights, cascading of requirements to sub-suppliers, and cooperation on corrective action plans. In cases of serious and unresolved breaches we may suspend or terminate the relationship.

We also require our suppliers and partners to comply with applicable data protection laws (including GDPR and equivalent frameworks), implement appropriate safeguards, and cooperate with us in ensuring the secure and lawful processing of personal data.

By embedding these commitments into our external relationships, Adastra contributes to a responsible and inclusive digital ecosystem. One that respects human rights, supports fair business practices, and delivers sustainable value to all stakeholders.

4. Reporting and Remediation

We are committed to maintaining an open, safe, and transparent environment where employees and third parties feel empowered to raise concerns related to human rights or ethical conduct.

We provide accessible and confidential reporting channels via line management, HR, or directly to the Global Chief People Officer using designated contact details. In addition, anonymous reporting options are available where permitted by law, ensuring that individuals who prefer not to disclose their identity can still raise concerns safely. All reports are treated seriously, handled with discretion, investigated promptly and fairly by trained personnel, and protected from retaliation.

Where human rights impacts or breaches are identified, we:

- **Conduct thorough assessments** to understand the root causes and potential harm.
- **Implement appropriate remedial actions**, which may include changes to policies, corrective steps with suppliers or partners, or support for affected individuals.

- **Document all cases and outcomes** to inform our ongoing risk analysis and prevention efforts.

We also recognize that effective remediation is not just about reacting to violations but **about learning and improving**. Insights gained from grievances feed into our broader human rights due diligence framework and help us prevent similar issues in the future.

We encourage a speak-up culture where accountability and responsibility go hand in hand with respect and fairness for everyone we work with and impact.

Concerns related to digital rights, including privacy, freedom of expression, children's online safety, or the unethical use of AI, can be reported through the same confidential and, where permitted, anonymous whistleblowing channels described in this Policy and will be handled without retaliation.

4.1 Grievance and Speak-Up Mechanism

Scope and Access: Employees and third parties can report concerns about human rights, discrimination or harassment, ethics, data protection, or digital rights at any time. Reports may be submitted to line management or local HR, who will ensure proper follow-up and, if relevant in a broader or cross-border context, escalate the matter to the Global Chief People Officer. Reports can also be made directly to the Global Chief People Officer using the designated contact details [vladimira.carroll@adastragr.com]. Confidentiality is ensured and retaliation is strictly prohibited. Adastra ensures that all reporting processes are fully compliant with GDPR and applicable national data protection frameworks, local employment legislation, safeguarding personal data and the legal rights of both whistleblowers and implicated persons. Anonymous reporting is available where permitted by law, to further strengthen trust in our grievance mechanism.

Owner: The Global/Local Chief People Officers oversee the process and coordinate HR and Legal to ensure timely follow-up.

Process and Timelines: Acknowledgement is provided within 7 calendar days, triage and assignment occur within 10 business days, immediate action is taken if there is imminent risk, and the target is to conclude within 90 days. If additional time is required, updates are provided at least every 30 days.

Outcome and Remediation: Findings lead to corrective actions. For example, training, disciplinary measures, policy changes, or a supplier corrective action plan. The reporter receives a summary of the outcome, subject to privacy and legal limits.

Recordkeeping and Learning: Cases are documented in line with law and internal policy, and aggregated insights inform prevention efforts and annual reporting.

Concerns specifically related to privacy or personal data handling are reviewed by the **Data Protection Officer (DPO)**, ensuring that data protection grievances are addressed effectively and in compliance with legal requirements.

5. Education and Awareness

At Adastra, we believe that human rights awareness is fundamental to ethical and responsible business conduct. We ensure that all employees are familiar with this policy and related standards such as our Global Code of Conduct, starting from their onboarding.

We provide accessible guidance materials and regular internal updates to help employees understand their responsibilities and make informed decisions in line with our values.

We also expect our suppliers and partners to align with these standards and foster awareness within their own organizations.

By embedding human rights into our internal communication and expectations, we strengthen a culture of accountability, fairness, and respect across everything we do.

6. Governance and Review

Adastra is committed to maintaining this Human Rights Policy as a living document that evolves with changing legal, social, and industry expectations. The policy is reviewed on a regular basis and updated as needed to reflect emerging risks, best practices, and stakeholder feedback.

Overall accountability lies with the Executive Leadership Team, while day-to-day implementation is supported by Human Resources and ESG functions. These teams work together to ensure that human rights considerations are embedded across business operations, governance processes, and external partnerships.

7. Final Statement

Respecting human rights is not optional; it is a fundamental responsibility and a core part of what it means to do business with integrity. At Aداstra, we understand that our actions, decisions, and relationships can have far-reaching impacts on people, communities, and society at large. That is why we are committed to embedding human rights considerations into the way we operate, lead, and grow.

This commitment goes beyond compliance. It reflects our belief in fairness, inclusion, transparency, and accountability—values that define who we are as a company. Whether we are working with clients, engaging with partners, or building solutions for the future, we aim to uphold the dignity and rights of every individual.

By aligning our business with internationally recognized human rights standards and cultivating a responsible culture across our teams and supply chain, we contribute to a more ethical, inclusive, and sustainable digital world.