## Social Accountability Policy

### 1. Purpose & Scope

**Sharrcem Sh.p.K.** (hereafter "the Company") is committed to uphold the highest standards of social accountability in all its operations and business relationships, in accordance with the **SA8000** standard. This policy applies to all employees, including permanent, temporary, contracted, or migrant workers, as well as to contractors, suppliers, subcontractors, and any other stakeholders whose operations the Company controls or influences.

### 2. Policy Statement

We believe that the respect for human rights, safe and healthy working conditions, fair remuneration, and dignity in the workplace are foundational to sustainable business success. The Company commits to complying with not only the laws of Kosovo and applicable regional/national laws but also with international labour standards, including **ILO** conventions, the Universal Declaration of Human Rights, and **SA8000** requirements.

### 3. Key Commitments

- Child Labor: The Company strictly prohibits the employment of children below the legal minimum working age. In cases where children are found in violation, immediate remediation will be enacted, including support for schooling and community reintegration.
- Forced or Compulsory Labor: All forms of forced, bonded, indentured or exploitative labour are forbidden. Workers have the freedom to terminate employment after reasonable notice; their documents (identity, passports etc.) shall never be withheld.
- Health & Safety: The Company will maintain a safe, hygienic and healthy working environment. Risks will be assessed, preventive measures adopted, training provided, personal protective equipment supplied, and emergency preparedness ensured. Health and safety provisions will also cover those working in remote locations or on site outside the main plant.
- Freedom of Association & Collective Bargaining: Workers have the right to join or form trade unions or other associations, bargain collectively, and involve in worker representation without fear of retaliation. Where trade unions are not present or recognized, the Company will encourage freely elected worker representatives.
- Non-Discrimination: Employment decisions (hiring, remuneration, promotion, transfer, training, benefits, termination) must be made without discrimination on grounds such as race, gender, religion, political opinion, nationality, disability, sexual orientation or any other status.

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- **Disciplinary Practices**: Disciplinary measures must respect dignity and rights. The Company will reject corporal punishment, mental or physical abuse, and any humiliating or coercive practices.
- Working Hours: Working hours shall comply with applicable national laws or industry best practice, whichever is more stringent. Overtime shall be voluntary, fairly compensated, and not excessive. Workers shall receive at least one rest day in every seven-day period.
- Remuneration: Workers shall be paid wages that meet or exceed legal minimums and that permit a decent standard of living. Overtime, benefits, and deductions shall comply with applicable laws, collective agreements, and SA8000 principles.

### 4. Management System & Implementation

- Senior Leadership Commitment: The senior management of Sharrcem is accountable for integrating \$A8000 principles into strategy, planning and performance. Leadership shall provide sufficient resources to implement, monitor, and continually improve social performance.
- Social Performance Team (SPT): We will establish a Social Performance Team with balanced representation of workers (or their representatives) and management. The SPT's responsibilities include risk assessment, policy enforcement, monitoring, Remedies, grievance handling, and reporting.
- Risk Assessment & Continuous Improvement: Regular risk assessments shall be conducted to identify potential or actual non-conformances across all social accountability areas. Corrective and preventive actions will be implemented, tracked and reviewed.

### 5. Grievance Mechanism & Transparency

- The Company will maintain accessible, confidential, nonretaliatory grievance procedures for any worker, supplier or subcontractor to report violations of this policy.
- Employees will be informed of their rights under this policy and \$A8000 via training and communication.
- The policy will be publicly available, including to workers, contractors, suppliers, customers and other stakeholders.

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### 6. Legal Compliance & Beyond

- Sharrcem will at all times meet or exceed legal obligations in Kosovo and any regional laws applicable to operations. Where SA8000 or other international norms are stricter, those stricter provisions will apply.
- The Company shall extend these principles throughout its supply chain: suppliers and subcontractors are expected to adhere to equivalent standards and will be selected or required based also on their social performance.

**Sharrcem Sh.p.K.** is committed to not just compliance, but continuous improvement in our social accountability performance, with the view of ensuring that all persons associated with our operations are treated fairly, with dignity, and in a safe, ethical working environment.

Hani I Elezit 15/09/2025

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