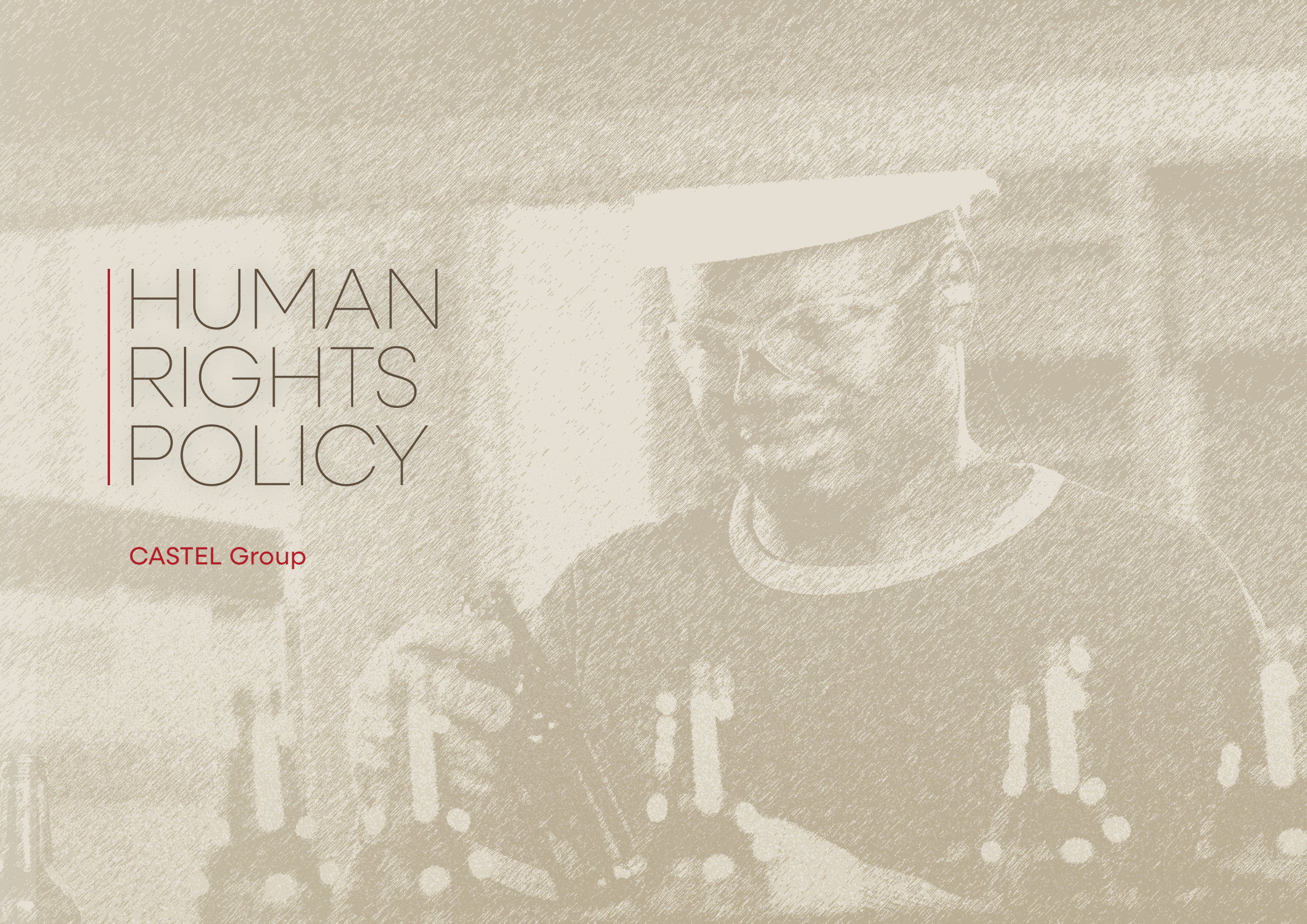
HUMAN RIGHTS POLICY

CASTEL Group



INTRODUCTION

The Castel Group[1] ("the Group") considers respect for human rights to be an essential value in the proper conduct of its activities.

The Group is committed to respecting and promoting internationally recognized fundamental principles of human rights, as defined in particular by the International Bill of Human Rights and the fundamental conventions of the International Labor Organization ("ILO"), following the recommendations of the United Nations Guiding Principles on Business and Human Rights, the principles of the Global Compact, and the OECD Guidelines.[2]

In addition to the Code of Conduct, this Human Rights Policy ("the Policy") formalizes the Group's ongoing commitment to prevent human rights violations against its employees and stakeholders.

This commitment is part of its Corporate Social Responsibility ("CSR") strategy and its duty of care, which structure its managerial and operational approach.

This Policy applies to all corporate officers, employees, temporary workers, non-salaried managers, work-study students, and interns of the Group (the "Employees") in the context of their professional activities, so that each of them can participate on a daily basis in ensuring compliance in all countries where the Group operates.

1 The Castel Group refers to all DF Holding SA subsidiaries.

2 International Bill of Human Rights consisting of the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, and the Universal Declaration of Human Rights; ILO Declaration on Fundamental Principles and Rights at Work and fundamental conventions (No. 29, 87, 98, 100, 105, 111, 138, 155, 182, 187); United Nations Guiding Principles on Business and Human Rights; Global Compact Principles; OECD Guidelines for Multinational Enterprises.

OUR COMMITMENT TO EMPLOYEES

Diversity, inclusion, and non-discrimination

Both in hiring and during the employment relationship, the Group is committed to equal opportunity and prohibits any form of discrimination, including on the basis of religion, skin color, nationality, ethnic or social origin, health, disability, marital status, pregnancy, sexual orientation, gender, age, political or philosophical opinions.

The Group applies a recruitment policy based on objective criteria of qualification, expertise, and experience.

Freedom of association and collective bargaining

The Group recognizes the freedom of association, to form and join a regularly constituted trade union for all Group employees, as well as the right to collective bargaining, without fear of reprisals or intimidation of any kind.

The Group attaches central importance to social dialogue through the social relations that its entities maintain with their employee representatives. This social dialogue, organized in accordance with applicable local laws, must be constructive, sincere, and in good faith.

In countries where the right to freedom of association and/or collective bargaining is not enshrined in law, the Group strives to develop alternative means of facilitating the representation of employees' interests.

Prohibition of forced labor and child labor

The Group prohibits all forms of forced labor and slavery. This includes prison labor, debt bondage, and, in general, all forms of human trafficking.

The Group reiterates the importance it attaches to the protection and development of children, particularly with regard to their education and health. Consequently, it takes the necessary measures to ensure compliance with international and national legislation on child labor, particularly with regard to the minimum age for employment and the nature of the tasks to be performed.

Working conditions

The Group implements policies that guarantee working conditions, remuneration, and rest periods that respect its Employees, in accordance with applicable local laws and in compliance with agreements entered into by entities with their employee representatives.

When long-term accommodation is provided to Employees, the Group undertakes to ensure that such accommodation complies with applicable local regulations or, failing that, with international and/or national recommendations where they exist.

Health and safety at work

The Group is committed to implementing a prevention and protection policy in the area of health and safety at work, in order to guarantee a safe and healthy working environment. Furthermore, the Group strictly prohibits all forms of violence and harassment at work, whether sexual or psychological, including sexist behavior.

The Group implements appropriate measures to ensure the safety of Employees in the course of their activities.

Training, information, and awareness

The Group trains its Employees to enable them to better understand their professional environment and develop their skills in line with the Group's needs.

OUR COMMITMENT TO STAKEHOLDERS

Business partners

The Group expects its first-tier suppliers to apply standards equivalent to its own when conducting activities on behalf of one of the Group's subsidiaries; it encourages its customers to do the same.

The Group is committed to regularly assessing the business partners with whom it engages, particularly first-tier subcontractors, for whom specific assessment policies are implemented.

If any non-compliant practices are identified, the Group will take appropriate measures to protect the interests of the persons concerned to the best of its ability.

Local communities

Taking into account the specific characteristics of the environments in which it operates, the Group is committed to supporting local communities and implementing a positive approach to respecting and preserving the traditions and cultures of the communities and populations living around its various sites.

The Group takes into account the environmental impacts that may be caused by its activities and, depending on the context, implements measures to limit nuisances and disturbances to local communities, in particular measures to limit the risks of pollution and those related to a reduction in their access to natural resources.

In addition to the impacts of its activities, the Group remains attentive to ensuring that its activities respect the rights of local communities, particularly through respect for land rights, access to water and health.

With the aim of contributing to local development, teams strive to build constructive relationships with local communities based on trust and respect for their rights, in particular through regular dialogue and by remaining attentive to these communities' right to express their needs and concerns.

GRIEVANCE MECHANISM

Anyone can use the whistleblowing system through various channels:

- By email to a dedicated address or to the address known to the whistleblowing manager, or via the reporting platform accessible via:

- By using, where available, dedicated infrastructure set up in agreement with employee representatives in designated areas within the subsidiaries;

- By reporting directly to the ethics officer.

IMPLEMENTATION, MONITORING, AND EVOLUTION OF THE POLICY

The Policy has been approved by the Group's Chief Executive Officer and the Board of Directors of DF Holding.

The Group's CSR Committee, chaired by its Chief Executive Officer, oversees its implementation and development within the Group and the environments in which it operates.

November 2025