



White Raven IT – Human Rights Policy

Introduction

White Raven IT BV is dedicated to upholding the principles of human rights as defined by the Universal Declaration of Human Rights. This Human Rights Policy outlines our commitment to ensuring that our operations, business practices, and partnerships respect and promote human rights. We expect all employees, contractors, suppliers, and third parties acting on behalf of the company to adhere to the standards set out in this policy.

Scope

This policy applies to all:

- Employees (including part-time, full-time, and temporary staff)
- Contractors
- Consultants
- Suppliers
- Third-party representatives acting on behalf of White Raven IT BV.

Policy Statement

1. Respect for Human Rights

- **Commitment:** White Raven IT BV is committed to respecting the human rights of all individuals affected by our operations. This includes employees, suppliers, local communities, and any other stakeholders involved in or impacted by our activities.
- **Implementation:** We integrate human rights considerations into our business processes and decision-making, ensuring that our operations do not infringe upon the rights of individuals or communities.

2. Non-Discrimination

- **Commitment:** We are committed to creating an inclusive work environment where all individuals are treated with dignity and respect, regardless of race, gender, age, religion, disability, sexual orientation, or any other characteristic protected by law.
- **Implementation:** All employment-related decisions, including recruitment, promotion, and compensation, are based on merit and free from bias. Discriminatory practices of any kind are strictly prohibited.

3. Safe and Healthy Working Conditions



- Commitment: White Raven IT BV is dedicated to providing and maintaining a safe and healthy working environment for all employees. We also ensure that our operations do not adversely affect the health and safety of local communities.
- Implementation: We comply with all relevant health and safety laws and regulations, conducting regular assessments to identify and mitigate risks. Employees are provided with the necessary training and resources to maintain a safe workplace.

4. Prohibition of Forced and Child Labor

- Commitment: We strictly prohibit any form of forced or child labor in our operations and supply chain. White Raven IT BV adheres to all national and international laws and standards regarding labor rights.
- Implementation: We conduct due diligence on our suppliers and partners to ensure they comply with our standards on labor rights. Any evidence of forced or child labor will result in immediate action, including termination of contracts and reporting to the appropriate authorities.

5. Freedom of Association and Collective Bargaining

- Commitment: We respect the right of employees to freely associate, form, or join trade unions, and bargain collectively in accordance with local laws and regulations.
- Implementation: We encourage open communication between employees and management, fostering an environment where concerns can be raised without fear of retaliation. Employees are informed of their rights to association and collective bargaining.

6. Complaint Handling Procedures

- Commitment: White Raven IT BV is committed to maintaining clear and effective procedures for handling complaints related to human rights violations, discrimination, or unethical behavior.
- Implementation: Employees, suppliers, and other stakeholders are encouraged to submit complaints through designated channels, including a confidential reporting system. All complaints will be thoroughly investigated, and appropriate measures will be taken to resolve any issues in a timely and fair manner.

7. Monitoring and Compliance

- Commitment: While we do not currently conduct regular audits, we are committed to monitoring our practices to ensure compliance with our human rights commitments.
- Implementation: We will continually review and improve our human rights practices, ensuring they align with evolving best practices and legal requirements. Internal



audits may be conducted as necessary to assess compliance and address any identified gaps.

Procedures for Compliance

1. Training and Awareness

- Training: All employees, contractors, and third-party representatives will receive training on the Human Rights Policy and related standards during onboarding. Refresher training will be provided annually to ensure ongoing awareness.
- Awareness: Regular communications will be issued to remind employees of their responsibilities under this policy and to update them on any changes.

2. Reporting Concerns

- Internal Reporting: Employees are required to report any concerns or evidence of human rights violations, discrimination, or unethical behavior to their direct manager or through the company's confidential reporting email at compliance@whiteravenit.be.
- Whistleblower Protection: White Raven IT BV ensures that employees who report concerns in good faith will not face retaliation. Confidentiality will be maintained to the fullest extent possible during the investigation of any reported issues.

Monitoring and Enforcement

1. Internal Audits

- White Raven IT BV will conduct periodic audits to ensure compliance with this policy, focusing on areas such as labor rights, non-discrimination, and working conditions. These audits will assess our internal practices as well as the practices of our suppliers and partners, with findings reported to senior management for action.

2. Disciplinary Action

- Any breach of this policy will result in disciplinary action, which may include termination of employment, termination of contracts with third parties, or reporting to legal authorities. Disciplinary actions will be proportionate to the severity of the violation and will be conducted in a fair and transparent manner.

Review of Policy

This policy will be reviewed annually by management to ensure its relevance and effectiveness. Changes will be made to align with any new regulatory requirements,



industry standards, and advancements in human rights practices. Changes will be communicated to all employees and contractors.

Contact Information

For questions, further information, or concerns related to this policy, please contact our Compliance Officer at compliance@whiteravenit.be.

This policy is integral to White Raven IT BV's commitment to conducting business with integrity, respect for human dignity, and adherence to legal and ethical standards.