

# DUFRY HUMAN RESOURCES POLICY



**DUFRY**

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# THE DUFRY GROUP HUMAN RESOURCES POLICY

## 1. PURPOSE

This Human Resources Policy (hereinafter, "the Policy") is part of the compliance management system of Dufry Ltd. and its subsidiaries and affiliated companies (hereinafter jointly referred to as "Dufry", or "the Dufry Group") further detailing its Code of Conduct which establishes respect for legality, diversity, non-discrimination and equal opportunities as axis of conduct to be followed in all its actions. Likewise, the provisions of this Policy are aligned with those included in the Dufry Supplier Code of Conduct, where Dufry outlines the expected business behavior of external suppliers and service providers. Both of these codes are available in the company website [www.dufry.com](http://www.dufry.com).

Dufry, as a multinational group, is aware of the permanent need to adapt its human resources policies to the different social and labor realities existing in the different countries where Dufry operates.

This Policy describes the common bases, principles and guidelines, which, in terms of human resources management, are applicable to the whole Group, recognizing the existence of particularities of each of the countries in which Dufry operates and, in any case, respecting the regulations applicable in each jurisdiction.

The objectives of this Policy are the following:

- i) To achieve the selection and retention of the best professionals.
- ii) To develop talent among its employees.
- iii) To foster a culture of integrity and respect.
- iv) To guarantee quality, safe and equal employment.
- v) To comply with the law and with Dufry's international commitments regarding respect for human rights in the workplace.
- vi) To be a company that is well regarded as an employer.

Dufry is committed to respecting human rights and supporting their realization throughout our operations and business relationships. Our commitment is based on the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and its successor and the ILO Occupational Safety and Health Convention.

## 2. SCOPE

The Policy applies to all companies of the Group. Policy is binding on all directors, officers and employees of Dufry and may be extended in whole or in part, by Dufry to any company related to the Company. Compliance with this Policy is the responsibility of all Dufry employees.

### 3. COMMITMENTS

The Policy is structured in seven areas of action that should serve as a guide in the recruitment, management and development of people and employees in Dufry. The areas are:

#### 3.1 Selection & Hiring

The selection and hiring processes are key for the recruitment of the most qualified professionals to achieve the Company's strategic objectives and the most suitable ones to develop the existing culture of integrity and respect in Dufry.

Dufry ensures that the selection and hiring processes are objective and impartial, establishing transparent and equal criteria.

Dufry promotes the hiring of local employment, that is to say, from the places where its work centers or operations are located, favoring, at the same time, the access of young people to their first job, through scholarship programs or agreements with Universities or other training entities.

Dufry will present candidates with a valuable employment proposal, through stable contracts, in order to attract and retain the best professionals.

Dufry will promote the internal mobility of its employees to cover vacancies, offering international mobility opportunities when needs are identified in other countries where Dufry operates.

Dufry does not accept any form of forced or compulsory labor, modern slavery or human trafficking in any of our global operations. Practices such as confiscating or withholding worker identity documents or other valuable items (e.g. work permits and travel documentation) are prohibited. Dufry shall not retain personal documents for the purpose of binding workers to employment. Employees will be free to terminate their employment upon reasonable notice. Dufry adheres to the provisions of international and local regulations established regarding the combatting of human trafficking, including the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act of 2015 to the extent applicable to our operations.

Dufry will not employ children below the minimum age for employment according to applicable law. Furthermore, Dufry shall ensure that persons under the age of 18 do not perform any offshore duties or undertake any hazardous work that could jeopardize their health or safety.

We support the use of legitimate workplace apprenticeship, internship and other similar programs for youth (i.e. individuals who are 15 to 17 years of age) that comply with all laws and regulations applicable to such programs and where hazardous work is not involved.

#### 3.2 Equality, Diversity and Respect for Human Rights

Dufry respects the applicable legislation in all jurisdictions in which it operates, promoting equal opportunities, diversity, inclusion and non-discrimination in the workplace.

Dufry is committed to promote equal opportunities and equal remuneration, favoring the integration of its employees without regard to an employee's race, color, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, political orientation, or disability. All forms of such discrimination violate the Dufry Code of Conduct and core values and will not be tolerated. Suspected discrimination should be reported in one of the ways set out in Appendix 1 of this policy.

In addition, the Company will conduct awareness campaigns among all its employees with the aim of developing equality and diversity in the workplace.

Dufry is committed to implementing and promoting measures to protect the dignity of its employees, to encourage their well-being, and to encourage respect in the workplace. As such, Dufry applies a zero tolerance policy for harassment and bullying. Employees that experience harassment should report it promptly in one of the ways set out in Appendix 1 of this policy.

### 3.3 Working Conditions and Labor Relations

Dufry aims to achieve a work environment that facilitates the work-life balance of its employees, fostering pride in belonging to Dufry and generating a culture of trust.

Dufry encourages its local organizations to establish paternity, maternity, adoption and parental leave programs to give parents additional flexibility and time to bond with their new child and adjust to the new family situation. Employees will normally be entitled to return to the same position or an equivalent position paid at the same rate at the end of their parental leave. However, there may be circumstances when this is not reasonably practicable or possible (e.g. site closure or position elimination). If this is the case, Dufry will consult with the employee.

Dufry will promote a culture of representation and dialogue both individually and collectively, in order to know the expectations of its employees, improving human resources management.

Dufry recognizes all workers have the right to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly. Dufry respects the right of workers to refrain from such activities, and respects their freedom of opinion and expression.

The right to negotiate collectively is respected. In countries where the right to collective bargaining is restricted by law or where employees have not elected or appointed representatives, or where the Dufry legal entity has lawfully decided not to recognize a labor organization, the Company will seek alternative means to ensure open communication and dialog between employees and management.

### 3.4 Health & Safety

Dufry is committed to promote a safe working environment in all its workplaces, committing itself to the following:

- i) Comply with current labor legislation on health and safety.
- ii) Reduce working-related accidents and working-related health conditions and diseases implementing the necessary occupational risk prevention plans in its work centers, to achieve an effective identification of risks and avoid them.
- iii) Promote a preventive culture, training employees to achieve the best safety standards.
- iv) To have due diligence in the coordination of activities and prevention measures with contractors, suppliers, or any third party that performs activities or is present in Dufry's work centers.
- v) Continuous improvement, establishing objectives and goals for improvement, systematically taking into account the requirements of stakeholders, continuously assessing performance, applying the necessary corrections to achieve the proposed goals, and establishing verification, auditing, and control processes to ensure that objectives are met.

### 3.5 Remuneration and Working Time

Dufry has a compensation policy to attract and motivate its workforce, aligned with the market and based on the recognition of the skills and merits of its employees.

Dufry provides its employees with fair and competitive compensation and benefits. Dufry aims to ensure that remuneration meets or exceeds local compensation conditions and guidelines thus ensuring an adequate standard of living for employees.

Compensations are based on the requirements of each position and employee performance. Dufry is committed to the principle of equal pay for equal work. Furthermore, compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law. Imported and migrant workers are to be provided equal wages, benefits and working conditions.

Dufry respects the right to rest and leisure and the right to family life. Where possible Dufry employees are offered various flexible working models to enable them to balance personal with company demands. Working weeks are not to exceed the maximum set by local law. Working hours of their employees are in line with applicable industry standards, laws and regulations.

### 3.6 Career Development and Advancement

Career advancement and development encourages growth and commitment from employees and increases job satisfaction, productivity, and service to Dufry.

At this regard, Dufry establishes homogeneous human resources management processes that advance in the implementation of a talent culture in all countries where the company operates, implementing periodic performance evaluations, based on objective criteria, to improve the professional development of staff and to enhance our Learning & Development programs.

### 3.7 Succession Planning

Dufry periodically assesses the leadership needs of the Group to ensure the selection of qualified leaders that are diverse and a good fit for the organization's mission and goals and have the necessary skills for the organization.

The Global Human Resources team establishes a succession plan that identifies critical executive and management positions, forecasts future vacancies in those positions and identifies potential managers who would fill vacancies. Vacancies will be filled from within or, in the event no viable candidate is available, on an "acting" basis while an external recruitment effort is conducted.

## 4. APPROVAL, CONTROL AND REVIEW

Dufry's CEO approves the present Policy.

Dufry Global Human Resources will periodically review the content of this Policy and will propose its modification or update with the aim of improving the human resources management system.

Julián Díaz González  
CEO Dufry  
December 2021

## APPENDIX 1

To support compliance with this Policy, Dufry encourages its employees to report any concerns regarding potential violations of this Policy, or any related law or regulations by using the following means:

- by email at [compliance@dufry.com](mailto:compliance@dufry.com);
- by phone on Dufry's Global Hotline Number at **+1 (228) 687 8188** (see below for country-specific toll free numbers); or
- through our web-based reporting platform at [www.dufry-compliance.com](http://www.dufry-compliance.com)

Employees also have the option to follow the hierarchical reporting line as set out in Dufry's internal policies. Dufry applies a zero tolerance policy for retaliation against employees who report violations of Dufry's policies, the Dufry Code of Conduct, or other wrongdoing in good faith.

Dufry's Global Hotline Number: **+1 (228) 687-8188**

Dufry's Country-Specific Toll Free Hotline Numbers:

<b>COUNTRY</b>	<b>TOLL FREE NUMBER</b>
Argentina	0800-666-0758
Brazil	0800-020-1544
Canada	1-800-485-6236
China	400-120-8504
Greece	30-2111983562
Mexico	01-800-099-0360
Russia	8-800-301-6981
Spain	900-963268
Switzerland	0800-838-240
United Kingdom	0800-088-5415
United States	1-800-758-1559

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