

Ethical Labor Practices and Human Rights Policy

Policy Statement:

At Halny Tech Ltd, we are committed to upholding the highest standards of ethical labour practices and respecting human rights throughout our operations and supply chain. We firmly believe that all individuals have the right to work in an environment free from modern-day slavery, forced labour, and any form of exploitation. This policy outlines our commitment to ensuring fair treatment, dignity, and respect for all workers involved in our business activities.

Scope:

This policy applies to all stakeholders, employees, contractors, suppliers, partners, and any other entities associated with Halny Tech Ltd globally. It encompasses all aspects of our operations, including development, sales, and procurement.

Principles:

1. *No Tolerance for Modern-Day Slavery and Forced Labor:* We unequivocally reject all forms of modern-day slavery, forced labour, human trafficking, and child labour. Our employees and partners are strictly prohibited from engaging in such practices, and we will not knowingly associate with any individuals or entities involved in these activities, whether directly or indirectly. We are committed to ensuring that all individuals working for or with our company are treated with respect, dignity, and fairness.
2. *Labor Standards and Working Conditions:* We are committed to providing safe, healthy, and fair working conditions for all employees, regardless of their position or location. This includes fair wages, reasonable working hours, compliance with applicable labour laws and regulations, and opportunities for professional development. Discrimination, harassment, and any form of abuse are strictly prohibited within our organization, and we encourage open communication to address any concerns that may arise.
3. *Freedom of Association:* We respect the right of our employees to freely associate, form or join trade unions, and engage in collective bargaining, as permitted by local laws.
4. *Supplier and Partner Responsibility:* We hold our suppliers, contractors, and business partners to the same high standards of ethical labour practices and human rights. We expect them to adhere to this policy and implement measures to prevent modern-day slavery and forced labour within their own operations.
5. *Supply Chain Due Diligence:* We are committed to conducting thorough due diligence on our supply chain to identify and mitigate risks related to modern-day slavery and forced labour.
6. *Reporting Mechanisms:* We encourage all stakeholders, employees, contractors, suppliers, partners, and clients to report any concerns, suspicions, or violations related to modern-day

slavery, forced labour, or human rights abuses. We will investigate all reported incidents promptly and take appropriate actions to address and rectify any issues identified. We guarantee protection against retaliation for those who raise legitimate concerns in good faith.

Compliance and Consequences:

Non-compliance with this policy may result in disciplinary actions, up to and including termination of employment or severing of business relationships. We are committed to continuous improvement and will regularly review and update this policy to ensure its effectiveness and alignment with evolving global standards, laws, regulations, and best practices. Additionally, we will work collaboratively with relevant stakeholders to address any identified areas of concern.

We, the leadership and employees of Halny Tech Ltd, stand united in our dedication to ethical labour practices and human rights, striving for a world where dignity, fairness, and respect are inherent in all workplaces.

Date: 23 September 2021

Authorized by: Jakub Konecki

Position: Director