

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. Our Commitment

Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced labor, and human trafficking. Paloma d.d. takes a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships.

2. Scope and Responsibility

This policy applies to everyone working for or on behalf of Paloma d.d., including employees at all levels, directors, agency workers, contractors, and business partners.

- The Management is responsible for ensuring this policy complies with our legal and ethical obligations.
- Managers at all levels are responsible for ensuring their teams understand and comply with this policy.

3. Supply Chain Standards

As a leading provider in the hygiene paper industry, we expect the same high standards from our contractors and suppliers. We integrate specific prohibitions against forced and trafficked labor into our contracting processes. We expect our suppliers to hold their own supply chains to these same standards.

4. Compliance and Reporting

The prevention and reporting of modern slavery is the responsibility of everyone at Paloma.

- If **employees** suspect any form of modern slavery within the business or supply chain, **they** must report it immediately to **their** Line Manager or a Company Director.
- We support transparency. No one will suffer any detrimental treatment (such as disciplinary action or threats) for reporting a concern in good faith, even if it turns out to be unfounded.

5. Communication and Training

- For Employees: Training on this policy is part of the induction process for all new staff. Updates are provided through our standard internal communication channels.
- For Partners: Our zero-tolerance approach must be communicated to all suppliers, contractors, and business partners at the start of our relationship and reinforced thereafter.

6. Breaches of Policy

- Employees: Any breach of this policy may result in disciplinary action, including dismissal for misconduct.
- Business Partners: We reserve the right to terminate our relationship with any individual or organization working on our behalf if they violate this policy.