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Human Rights Policy



CTT Group

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Human Rights Policy

Respecting and protecting human rights are essential values for preserving the dignity of individuals, communities, companies, and institutions. For CTT Group, adopting responsible business conduct positively contributes to the continuous enhancement of individual and collective well-being, always allowing for the realization of each person's capabilities and potential.

I. Principles and Purpose

The Human Rights Policy of CTT Group reflects the group's commitment to promoting and respecting human rights in the development of its various activities, in its relationships with customers, suppliers, and partners, and in the communities where it operates.

This policy applies to all employees, suppliers, business partners, and other stakeholders, aligning with the Ten Principles of the United Nations Global Compact and human rights standards founded on International Law.

CTT Group also recognizes the importance of respecting the human rights of the communities in which it operates, with special attention to vulnerable communities. The widespread presence in the country, including in low-density interior areas, makes proximity to local communities a distinctive factor assumed as one of CTT Group's strategic values, generating a relationship of trust and solidarity between the community and the company, which allows CTT to play a significant role in the defense and promotion of human rights.

II. Objectives and Commitments

In 2021, CTT Group joined the United Nations Global Compact, integrating its Ten Principles across its strategy and activities. This commitment includes:

- a) Promoting equal opportunities and prohibiting any form of discrimination, including, among others, race, ethnicity, color, sex, gender, sexual orientation, age, religious belief,

nationality, marital status, socioeconomic status, disability, and political conviction, ensuring a fair and inclusive work environment for all.

- b) Ensuring a safe and healthy work environment that promotes the dignity and well-being of employees, respecting rest periods and guaranteeing access to social protection.
- c) Promoting fair and equitable remuneration for all employees, based on experience, responsibilities, and functions performed, in accordance with applicable legislation and internal remuneration policies, rejecting any form of discrimination in the compensation process, and always valuing merit, competence, and commitment.
- d) Preventing and combating all forms of harassment, abuse, and violence at work, adopting a zero-tolerance policy for behaviors that compromise dignity and respect, and sanctioning any acts of intimidation, humiliation, or coercion.
- e) Prohibiting child labor and forced or coercive labor in all its activities and value chain, promoting free and voluntary employment and ensuring that no one is forced to work through force, coercion, or any form of punishment.
- f) Respecting the freedom of association and the right to collective bargaining for all employees, promoting constructive and fair dialogue and ensuring that no one is subject to discrimination or retaliation for exercising these rights.
- g) Respecting the privacy of personal data of employees and other stakeholders, adopting strict practices for the protection and management of personal data in accordance with applicable legislation.

Regarding local communities, CTT Group's commitments include:

- a) Respecting the fundamental rights and freedoms of local communities, as well as the stability of community relations, and striving to minimize negative impacts and maximize the positive aspects of its presence and activities.
- b) Ensuring the right of communities to be heard by promoting open dialogue with community representatives where they operate and providing transparent information about CTT Group's activities.

To promote respect for human rights throughout the value chain, in all its activities and in all geographies where it operates, CTT Group:

- a) Encourages employees, suppliers, partners, and customers to adopt practices that respect human rights.
- b) Conducts assessments and monitoring whenever deemed relevant or appropriate to ensure that partners respect the human rights standards established by CTT Group.
- c) Reserves the right to consider terminating contractual relationships if evidence of human rights violations is detected.

III. Scope: Value Chain and Stakeholders

This Policy applies generally to all entities within CTT Group, except where legal or statutory requirements mandate that certain companies have their own policies approved by their respective management bodies.

In exercising its shareholder function, CTT Group will seek to promote the adoption of this policy or equivalent principles and commitments, ensuring the overall consistency of the policies adopted within the group, so that companies with their own policies define them in terms no less stringent than those defined directly by CTT Group.

In observing this policy, CTT Group will also consider its external impact, beyond its direct counterparts, on various stakeholders, including the surrounding community.

IV. References and Safeguards

In implementing this Policy, CTT Group observes and promotes compliance not only with applicable general legislation and regulations but also with the following references and safeguards, to be adhered to and enforced through its governance model and in conjunction with the group's other policies:

- (i) **International Bill of Human Rights;**
- (ii) **Guidelines of the Organization for Economic Co-operation and Development (OECD)** for Multinational Enterprises;
- (iii) **United Nations Guiding Principles** on Business and Human Rights.
- (iv) **Fundamental Conventions of the International Labour Organization (ILO)** identified in the Declaration on Fundamental Principles and Rights at Work.

V. Governance: Definition, Execution, Control, and Disclosure

V.1. Definition, Implementation, Control, and Disclosure

The adoption of this Policy takes place within the framework of CTT Group's governance model, as outlined in the respective regulations, as follows:

Definition:	Board of Directors
Implementation:	Executive Committee and ESG Steering Committee Area(s) responsible for people management & development
Control:	Sustainability Committee Ethics Committee
Disclosure:	Area(s) responsible for internal and external communication and disclosure

To this end, CTT Group, recognizing the role of its organization and leadership in ensuring the alignment of its activities with the aforementioned references, not only commits to respecting them but also to cooperating in the remediation of any adverse impacts through legitimate processes and procedures, treating the respective risks as a relevant matter of legal compliance.

V.2. Due Diligence – Control Mechanisms

In addition to the aforementioned *substantive safeguards*, CTT Group further commits to accompanying them with *procedural safeguards*, existing or to be created, integrated into the group's governance model, so that the assignments and responsibilities for their definition, implementation, control, disclosure, and review are defined in clear, precise, demonstrable, and auditable terms, including, in particular, with regard to the fulfillment of its duty of corporate diligence, as applicable to its activities, both in its operations and with its suppliers.

To ensure compliance with this policy, CTT Group has implemented:

- a) Risk Management Process: The internal control system includes the identification, assessment, management, and reporting of risks related to human rights, ensuring the

definition and monitoring of the execution of mitigation actions, as well as preventive, corrective, and remedial measures, when necessary.

- b) Internal Reporting Channels: All employees and third parties have access to a reporting channel to the Ethics Committee through which they can report any violation of ethical principles, particularly any violation of human rights. They also have access to a confidential channel for reporting infractions, ensuring the safety and integrity of the whistleblowers, in accordance with applicable legislation and regulations, particularly Law No. 93/2021, of December 20.

V.3. Disclosure and Training Mechanisms

To ensure that all employees understand and apply this policy:

- a) Policy Disclosure: The policy is communicated to employees, suppliers, and business partners, and is available on the intranet and the CTT Group website.
- b) Training: CTT Group promotes initiatives and training sessions on its ethical principles, reinforcing the importance of human rights.
- c) Awareness: A culture of respect for human rights is promoted, encouraging the involvement of all stakeholders and fostering ethical work practices.

VI. Validity and Review

This Policy was approved on 20 March 2025 and is reviewed at least every 2 years.