



# HUMAN RIGHTS MANAGEMENT

RESPECT PEOPLE'S RIGHTS AND DIGNITY  
JANUARY 2025



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# ALTRAD AT A GLANCE



“OUR PURPOSE IS TO BUILD A SUSTAINABLE WORLD, STRIVING TO CREATE AN INCLUSIVE AND DIVERSE WORK ENVIRONMENT, AND TO MAKE A POSITIVE CONTRIBUTION THROUGH OUR ACTIVITIES. TO CREATE A MEANINGFUL LEGACY TO SOCIETY.”

**MOHED ALTRAD**  
FOUNDER AND PRESIDENT

## OUR VALUES



### RESPECT

We treat people with consideration, regardless of their position. We conduct our business in accordance with exemplary standards of transparency, integrity and honesty. We hold a deep sense of responsibility towards all our stakeholders and the environment we work in.



### SOLIDARITY

Solidarity is about teamwork and reliability. We collaborate and contribute to the different projects we undertake together by sharing ideas and opportunities, knowledge and resources. We support each other and stand up for each other. We always foster open and collaborative relationships and we put the common good before personal interest.



### COURAGE

We are eager to reach out beyond new boundaries and we are willing to explore innovative ways of thinking and working. What we do is therefore not easy - we are entrepreneurs and thus take risks and challenge ourselves all the time. Our objective is to always achieve the best outcome despite the difficulties.



### HUMILITY

We are open to differing points of view and are convinced that we can learn from anyone, anywhere. We always act and lead in a manner that expresses a spirit of inclusion. We tend to learn from mistakes and successes in equal measure and, above all, we never underestimate our competition. For every project, we seek and provide honest feedback to reach our goals by continuous improvement.



### CONVIVIALITY

Every day, we try to create a work environment that reflects the spirit of our teams, based upon commitment and open-mindedness. Together, we know how to share and to collaborate in a convivial spirit. We also celebrate success and combine functional excellence and cross-functional teamwork to produce exceptional ideas and results.

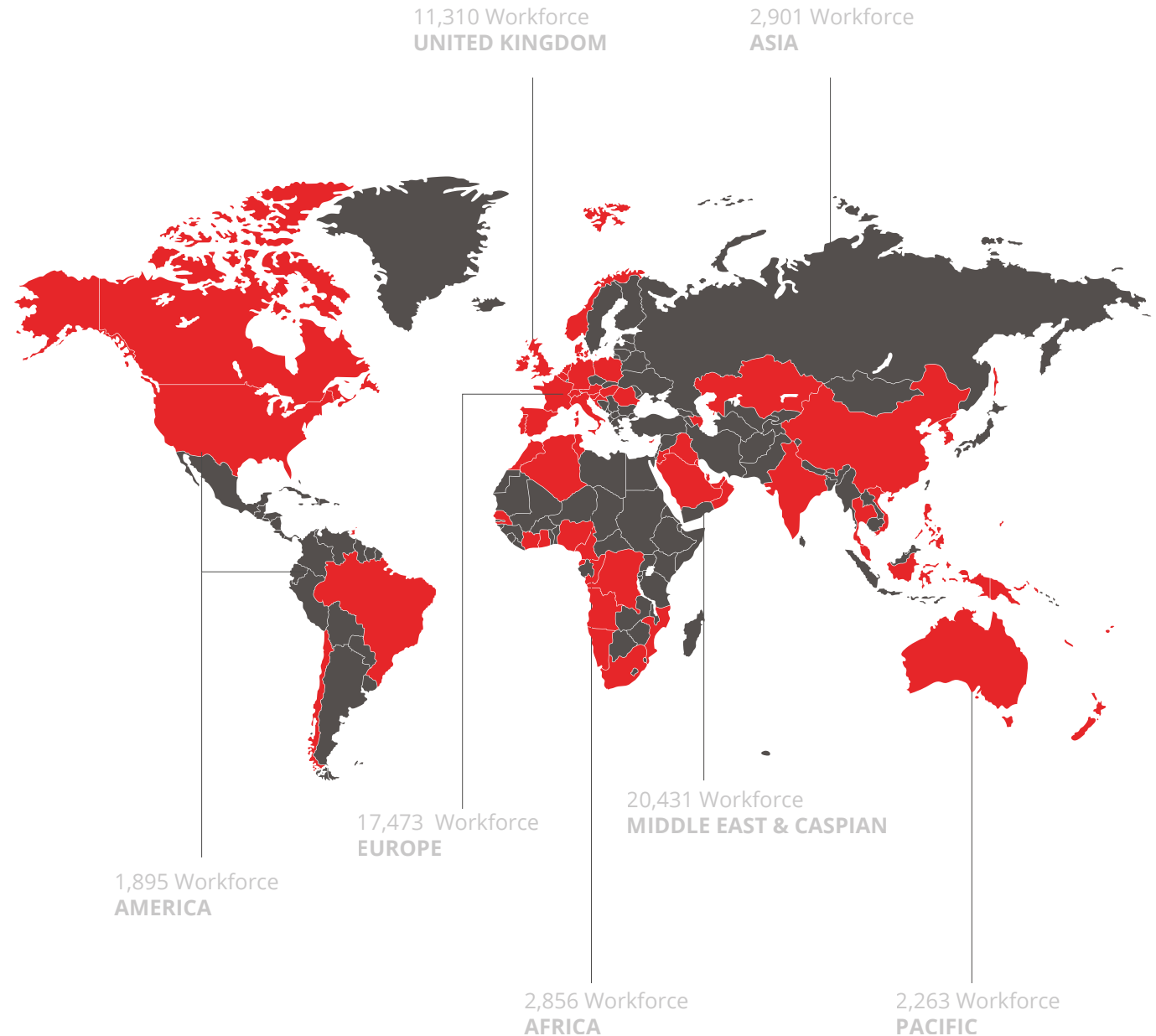
# ALTRAD AT A GLANCE

ALTRAD IS A WORLD LEADING INTERNATIONAL PROVIDER OF INDUSTRIAL SERVICES TO A WIDE RANGE OF INDUSTRIAL SECTORS.

THE GROUP IS ALSO A RECOGNISED LEADER IN THE MANUFACTURING AND DISTRIBUTION OF EQUIPMENT AND DEDICATED TO THE CONSTRUCTION AND BUILDING MARKETS.

Workforce 59 000  
49 Countries

\* FY2024 data



# OUR COMMITMENTS

AT ALTRAD, WE ARE COMMITTED TO UPHOLDING HUMAN RIGHTS BY FOSTERING A RESPECTFUL, INCLUSIVE WORKPLACE WHERE ALL EMPLOYEES AND SOCIAL PARTNERS ARE TREATED FAIRLY AND ETHICALLY.



## AS A RESPONSIBLE EMPLOYER AND A COMMITTED MEMBER OF SOCIETY, WE ADHERE TO:

- The Universal Declaration of Human Rights.
- The principles outlined in the fundamental conventions of the International Labour Organization (ILO).
- The United Nations Sustainable Development Goals (UN SDGs).

## AS AN ORGANISATION HEADQUARTERED IN FRANCE, WE COMPLY WITH EU REGULATIONS AND PROACTIVELY INTEGRATE:

- The European Union Corporate Sustainability Reporting Directive (CSRD).
- The European Sustainability Reporting Standards (ESRS)  
In addition to the adherence to the local regulations by each subsidiary.

*These commitments guide our actions and ensure that we meet the highest standards of corporate responsibility and transparency.*

# INTERNAL ASSESSMENT

ALTRAD identifies human rights risks through robust internal systems and assessments.

We continuously review our internal processes to ensure the highest standards are met and have undertaken the following to align with European and International standards:

- **2022** – Global Risk Mapping assessment.
- **2024** – Double Materiality assessment for the global ALTRAD business in alignment to European Corporate Sustainability Reporting Directive and European Reporting Standards.

This assessment helps us evaluate two important aspects:

1. How human rights concerns could impact our work at ALTRAD (outside-in).
2. How our operations might affect society and the environment (inside-out).

By looking at both perspectives, we gain a complete picture of our overall impact and the financial importance of each issue, allowing us to make more informed and responsible decisions.

10 ESRS Chapters

77 ESG issues

Impacts, risks, and opportunities identified for every topic

**DOUBLE MATERIALITY ASSESMENT**

Desktop Research

Workshop Survey

Executive Dialogue

# INTERNAL ASSESSMENT

2022

## ESG Risk Mapping

The 2022 risk mapping identified these three domains as 'high risk'



2024

## Double Materiality Assessment

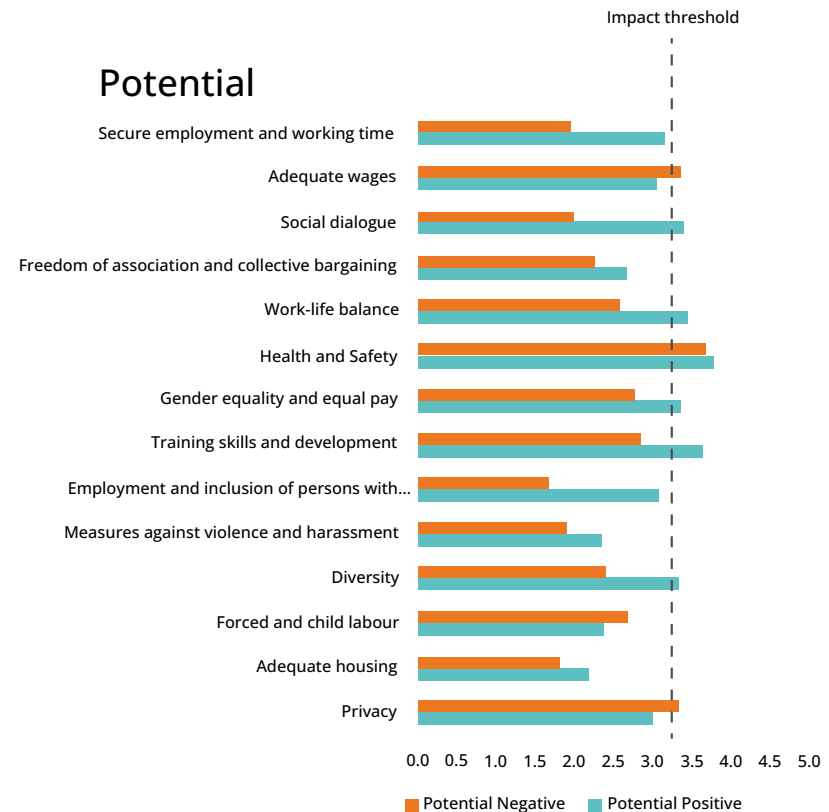
H&S identified as of first importance in terms of impact



Other categories related to our "own workforce" Impact either positively or negatively



As part of our overall ESG strategy and commitments to being a responsible employer, in relation to human rights, ALTRAD will actively monitor and report against the disclosures outlined in the ESRS S1 Own Workforce category. The results of the Global ALTRAD 2024 Double Materiality Assessment for ESRS S1 Own Workforce are as follows:



# PROACTIVE RISK MITIGATION

TO ENSURE ROBUST MONITORING, IDENTIFICATION, AND MANAGEMENT OF POTENTIAL RISKS, ALTRAD IMPLEMENTS THE FOLLOWING MANDATES TO ENSURE HUMAN RIGHTS AND ETHICAL PRACTICES ARE UPHELD:

01

**PROHIBIT ALL FORMS OF FORCED LABOUR, CHILD LABOUR, AND HUMAN TRAFFICKING.**

02

**PROHIBIT ANY FORM OF VIOLENCE, HARASSMENT AND ANY DISCRIMINATION.**

whether based on origin, nationality, gender, age, disability, sexual orientation, or affiliation with a political, religious, union, organisation, or minority group.

03

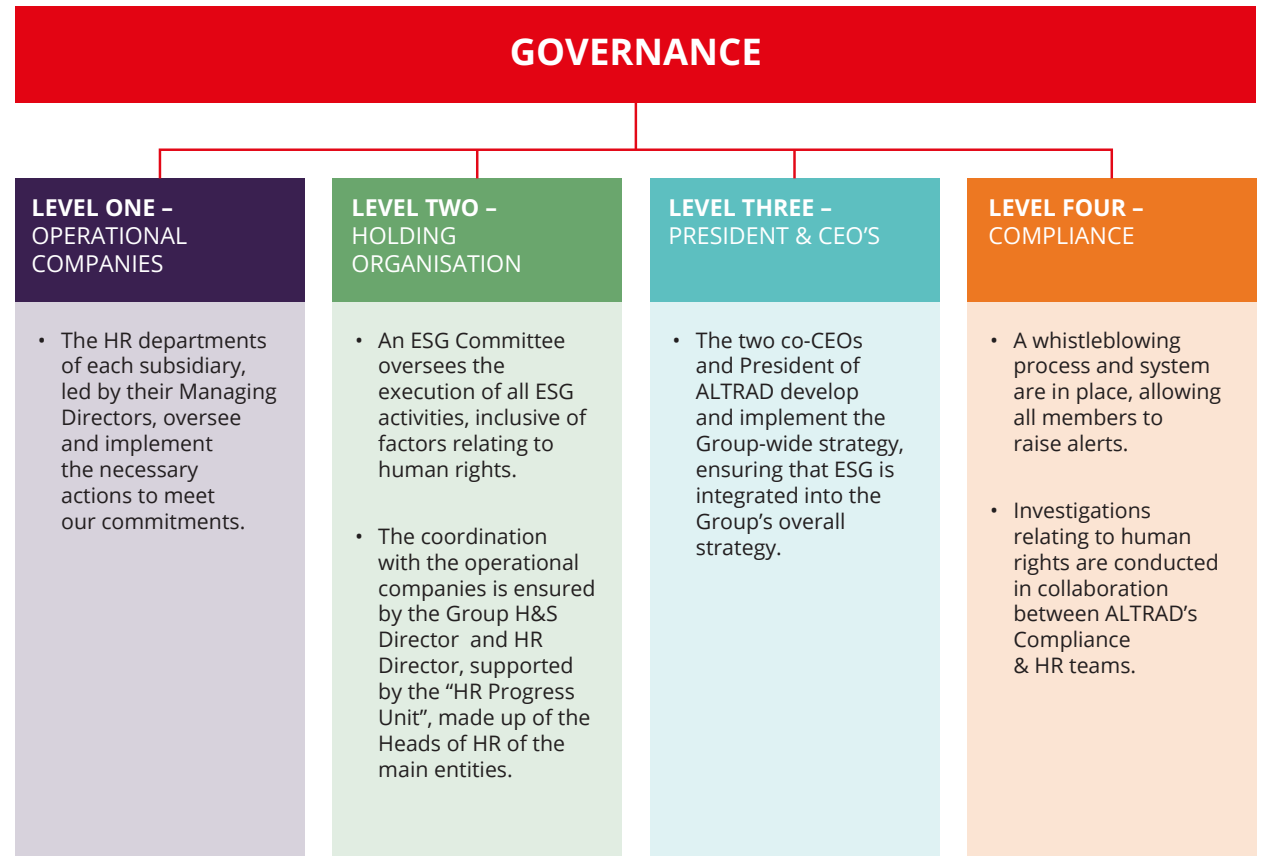
**TAKE THE NECESSARY STEPS TO ENSURE DECENT WORKING CONDITIONS BY:**

- A. Ensuring personal health & safety, including work-life balance and adequate housing.
- B. Securing employment and regulating working time.
- C. Ensuring adequate wages to all employees.
- D. Promoting diversity and inclusion in the workplace, and monitoring gender pay equality.
- E. Respecting freedom of association, collective bargaining and social dialogue in general.
- F. Promoting skills enhancement and development through training.
- G. Respecting the privacy of our employees and the privacy of their personal data.



# OUR ACTION PLAN GOVERNANCE

TO ADDRESS THE RISKS, WE HAVE CREATED A GOVERNANCE FRAMEWORK DESIGNED TO ENSURE WE MEET OUR COMMITMENT TO FOSTERING A RESPECTFUL, INCLUSIVE ENVIRONMENT WHERE ALL INDIVIDUALS ARE TREATED FAIRLY AND ETHICALLY, IN LINE WITH OUR DEDICATION TO UPHOLDING HUMAN RIGHTS.



*Our Governance is supported by our systems and processes, which capture and monitor progress using specified metrics:*

- **Air System**  
ALTRAD Global reporting system used for non-financial reporting. All entities report all required data annually.
- **Employee Surveys**  
Conducted at a global or local level, feedback is gathered at regular intervals on a range of topics.

# OUR ACTION PLAN

## 01 PROHIBIT ALL FORMS OF FORCED LABOUR, CHILD LABOUR AND HUMAN TRAFFICKING.

### OUR COMMITMENT

*We are committed to eradicating all forms of slavery, child exploitation, and human trafficking.*

- We ensure full compliance with ILO standards in all countries where we operate, even in those that have not ratified the relevant conventions.
- We prohibit the hiring of employees under the age of 15 and ensure that the minimum age for hazardous work is set at 18 years.
- We are particularly vigilant in preventing forced labour, especially in regions with migrant workers. We require that all labour must be voluntary, allowing workers the freedom to leave at any time, aligned to ALTRAD's fair and equitable workplaces practices, with all owed remuneration paid in full.

### ACTIONS

#### ACTIONS TO DATE:

- May 2022: Launched a modern slavery self-assessment for ALTRAD subsidiaries to identify potential risks and mitigation measures.
- Survey Sent to 65 Business Units: Focused on hiring abroad, hiring of local staff only, recruitment methods (agencies, etc) and subcontractor use.

#### WE WILL:

*Strengthen the Group's anti-modern slavery policy with: Group guidelines communicated to the Supply Chain partners.*

- Reinforcement of the whistleblowing policy and "Speak-up" procedures.
- A follow up of the 2022 assessment including newly acquired companies and audits to be conducted on-site.

### STANDARDS OF REFERENCE

- Modern Slavery Act 2015.
- France Duty of Vigilance Law (March 2017).
- ILO Minimum Age Convention N°138.
- UNICEF Child Labor Index.
- Walk Free Modern Slavery Index.
- ALTRAD Modern Slavery Statement.
- ALTRAD Business Integrity & Ethics code.

# OUR ACTION PLAN

## 02 PROHIBIT ANY FORM OF VIOLENCE, HARASSMENT AND ANY DISCRIMINATION.

### OUR COMMITMENT

*We do not tolerate any form of violence, harassment, or any discrimination whether based on origin, nationality, gender, age, disability, sexual orientation or affiliation with a political, religious, union, organisation or minority group.*

- Expectations: All employees and partners must respect others and ensure a safe, non-discriminatory work environment, as stated in our Business Integrity and Ethics Code.
- Responsible Employer Actions: ALTRAD operates a zero-tolerance policy for any form of violence, harassment and discrimination in the workplace, treat all incidents seriously and promptly investigate all allegations.

### ACTIONS

#### ACTIONS TO DATE:

- Whistleblowing Process:
  - **Reports** can be made on discriminatory behaviour or labour exploitation contrary to Group values.
  - **Eligible Reporters:** All employees, former employees, job applicants and any external stakeholder.
  - **Reporting:** Alerts are managed through a dedicated platform and received by the Head of Compliance and are duly investigated.

#### WE WILL:

- Develop and communicate a Zero-Tolerance Policy.
- Continue the education of our employees on the whistleblowing process.
- Issue regular communications to update and inform employees about the procedure and its importance.

### STANDARDS OF REFERENCE

- ILO Discrimination convention (N°111).
- ILO Violence and harassment convention (N° 190).
- Universal Declaration of Human Rights.
- Internal Whistleblowing Procedure.
- ALTRAD Business Integrity & Ethics code.

# OUR ACTION PLAN

**03A ENSURING PERSONAL HEALTH & SAFETY, INCLUDING WORK-LIFE BALANCE AND ADEQUATE HOUSING.**

## OUR COMMITMENT

*We are fully committed to fostering a safe and healthy working environment for all employees and stakeholders.*

- **We unify** diverse safety cultures into a “One ALTRAD” mindset.
- **Health and Safety (H&S)** is not just a set of values but a fundamental mindset that drives the behaviours and decisions of all employees.
- **We promote** work-life balance and are fully committed to providing adequate, safe, and comfortable accommodation for our workforce when housing is employer-provided.

## ACTIONS

### ACTIONS TO DATE:

- Nine centralised standards and specific annual focus areas communicated.
- Global Minimum Standards issued, unifying the approach to key areas, including Incident Management, Risk Management, Leadership Visibility, and Improvement Planning.
- AIR (Altrad Integrated Reporting 2023, AIR) System developed and deployed, tracking health and safety related performance and delivering detailed analytics.
- Significant reduction of incidents and overall improvement of safety metrics.

### WE WILL:

- Carry on implementing actions aimed at achieving a 5% annual reduction in the Total Recordable injury frequency rate (TRIFR).
- Ensure the deployment of our actions and culture in the newly acquired companies procedure and its importance.

## STANDARDS OF REFERENCE

- HSEQ-W Policy Statement.
- ALTRAD HUB Standards.
- ALTRAD Technical Guidance.
- ALTRAD Integrated Reporting System (AIR) ... (p18).
- ALTRAD Life Saving Actions.
- ILO Occupational Safety & Health Convention (N°155).
- SDG – Goal 3 – Good Health and Well being.

# OUR ACTION PLAN

## 03B SECURING EMPLOYMENT AND WORKING TIME.

### OUR COMMITMENT

*We strive towards creating a business and work environment favouring the internal development and promotion of group members.*

- We ensure reasonable working hours across the organisation.
- We actively develop long-term career paths for our people and promote internal succession.
- We prohibit long-term temporary contracts.

### ACTIONS

#### ACTIONS TO DATE:

- Flexible working options : ALTRAD offers flexible working options such as remote working and flexible working hours, where it is deemed appropriate to the job role.
- Compliance with the local regulations is monitored in terms of working hours and holidays.
- Proportion of Temporary workers: Regular monitoring of the proportion of workforce across the ALTRAD Group subsidiaries to ensure there is adequate balance.
- Financial Stability: ALTRAD continues to demonstrate strong commercial and financial growth which serves for long term and secure employment for current and future employees.

#### WE WILL:

- Enhance work-life balance through initiatives such as wellness programs, stress management resources, and family-friendly policies.
- Enhance the reporting of metrics in this domain, to identify areas of improvement and take necessary counter-measures.

### STANDARDS OF REFERENCE

- SDG Goal 8 – Promote sustained, inclusive, and sustainable economic growth, full and productive employment and decent work for all.

# OUR ACTION PLAN

## 03C ENSURING ADEQUATE WAGES TO ALL EMPLOYEES.

### OUR COMMITMENT

*We comply with national legal minimum wages and regulations on social insurances, and ensure fair compensation based on local market conditions by:*

- Timely Pay: We guarantee timely delivery of employee pay.
- We take the necessary actions aiming at equal pay for equal work for our direct employees.
- We ensure competitiveness of our compensation packages to ensure stability of the workforce.

### ACTIONS

#### ACTIONS TO DATE:

- We monitor changes in national law and collective bargaining agreements to ensure the compliance of our wages with legal minimum wages and with regulations on social insurance payments and paid holidays.
- We ensure regular monitoring of compensation packages in alignment to industry standards, to be taken into account in decisions linked to recruitment and retention.
- We promote, beyond standard market practices, a “win-win” principle in remuneration to ensure that direct employees benefit from the financial performance.
- Whistleblowing system allows employees to file complaints related to pay.

#### WE WILL:

- Develop and communicate a dedicated policy.

### STANDARDS OF REFERENCE

- Universal Declaration of Human Rights (Article 25).
- International covenant on Economic Social and Culture Right.

# OUR ACTION PLAN

## 03D PROMOTING DIVERSITY AND INCLUSION ON THE WORKPLACE, AND MONITORING GENDER PAY EQUALITY.

### OUR COMMITMENT

*“Let’s Fly Together” our DEI pledge reflects our commitment to ensuring everyone at ALTRAD feels safe, seen, and valued, setting the foundation for an inclusive environment:*

- Promote Gender Diversity:
  - GOAL: 15% representation of women across the entire ALTRAD Group by 2035, with interim targets at 9% by August 2027, 13% by the end of 2030.
- Inclusion Beyond Gender:
  - GOAL: We aim to foster an inclusive environment which supports disabilities, ethnic backgrounds, cultural practices, religious beliefs, sexual orientation, ages, neurodiversity, and diverse socio-economic backgrounds.

### ACTIONS

#### ACTIONS TO DATE:

*Progress Unit-Established in 2022 and sponsored by Group CEO, with representation across ALTRAD subsidiaries to promote diversity and inclusion:*

- Development of ALTRAD diversity vision and definition of Group gender targets.
- Development and launch of group wide training and education programmes.
- Development and launch of a series of events and communication to actively raise.
- Gained a certificate from EDSP (European Supplier Diversity Programme).

#### WE WILL:

- Broaden the collection of data to measure gender diversity across the Group, including metrics on headcount and training.
- Monitor gender pay gap.
- Continue efforts to promote diversity & inclusion in all its aspects and launch initiatives aligned to our vision.

### STANDARDS OF REFERENCE

- ILO Equal Remuneration Convention (N°100).
- SDG – Goal 5 – Gender equality.
- ESDP.
- Our DEIB Pledge.

# OUR ACTION PLAN

## 03E RESPECTING FREEDOM OF ASSOCIATION, COLLECTIVE BARGAINING AND SOCIAL DIALOGUE.

### OUR COMMITMENT

*We adhere to ILO standards by respecting freedom of association and collective bargaining and recognising the importance of social dialogue.*

- **Cooperation with Representatives:** Work cooperatively with trade unions or work councils chosen by employees.
- **Collective Negotiation:**
  - Follow the legal framework of each country.
  - Ensure negotiations are fair, constructive, and based on good faith.
  - Ensure the implementation of the Collective Negotiation agreement.
- **Alternative Representation:** Support alternative methods of worker representation or engagement where freedom of association is restricted or prohibited by law.

### ACTIONS

#### ACTIONS TO DATE:

- **We regularly review and update practices to align with global labour rights,** also taking into account the constant growth of our group. For example in 2024, the establishment of a work council to represent all France based subsidiaries.
- **We promote** an environment of social dialogue based on internal and open communication from senior leaders.
- **Whistleblowing process** allows members to report any action against freedom of association.

#### WE WILL:

- Confirm our commitment through a dedicated policy and improve the collection of metrics to ensure implementation of counter measures.

### STANDARDS OF REFERENCE

- ILO Right to organise and Collective Bargaining Convention (N°98).
- ILO Freedom of Association and Protection of the Rights to organise Convention (N°87).



# OUR ACTION PLAN

## 03F PROMOTING SKILLS ENHANCEMENT AND DEVELOPMENT THROUGH TRAINING.

### OUR COMMITMENT

*We commit to enabling each employee to fully realise their potential within the group by:*

- Prioritising training, upskilling, and reskilling.
- Using qualifications, skills, and experience as the basis for recruitment, placement, and advancement.
- Promoting youth employment through vocational training, apprenticeships, and graduate programmes.

*ALTRAD Group is also committed to promoting local communities through three key principles:*

- Transferring know-how to local personnel.
- Providing skills training programs.
- Creating conditions to nurture local talent in both established and emerging regions.

### ACTIONS

#### ACTIONS TO DATE:

We promote initiatives aimed at the employee development and integration. For instance :

- Over 1 million hours of training organised during financial year 2023 across the ALTRAD Group.
- We support apprenticeship across the organisation based on various local initiatives.

#### WE WILL

- Improve the granularity of the reporting in this domain, to ensure that our training effort is aligned with the priorities of our strategy.
- Further develop training schools initiatives such as "Endel Ecole des Metiers" or "ALTRAD Academy".

### STANDARDS OF REFERENCE

- ILO Human Resources Development Convention (N°142).
- SDG – Goal 13 – Promote lifelong learning for all.

# OUR ACTION PLAN

**03G** RESPECTING THE PRIVACY OF OUR EMPLOYEES AND THE PRIVACY OF THEIR PERSONAL DATA.

## OUR COMMITMENT

*We uphold the privacy of employees and their personal data in accordance with International Standards.*

- **Compliance:** Ensure all personal data is handled, stored, and processed in full compliance with General Data Protection Regulation (GDPR) and other international standards requirements.
- **Data Protection Measures:** Apply strict data protection policies and security measures to safeguard personal information.
- **Transparency and Access:** Provide clear information to employees about how their data is used and ensure they have access to their personal information.

## ACTIONS

**ACTIONS TO DATE:**  
Please refer to general privacy page.

## STANDARDS OF REFERENCE

- General Data Protection Regulation (GDPR).

# DATA & REPORTING

STARTING FROM FY2025, WE WILL ENHANCE OUR DATA REPORTING BY EXPANDING THE SCOPE OF OUR ANNUAL SURVEY.

THIS EXTENDED REPORTING WILL INCLUDE A BROADER RANGE OF INFORMATION COLLECTED THROUGH THE AIR SYSTEM. WE WILL ORGANISE THE AUDIT PROCESS OF THE REPORTED INFORMATION.



