



Lhoist Group

Respectful Workplace Code

Nurturing a respectful and inclusive culture in the workplace is a high priority

Table of contents

- 1. Introduction 2
- 2. Definitions 2
 - 2.1. Harassment..... 2
 - 2.1.1. Moral harassment..... 2
 - 2.1.2. Sexual harassment 2
 - 2.2. Microaggression 3
 - 2.3. Discrimination 3
- 3. Reporting process 3
 - 3.1. Reporting the Incident 3
 - 3.2. Initial Internal Process..... 3
 - 3.3. Confidentiality and Non-retaliation 3
- 4. Feedback & follow-up 3
- 5. Disciplinary Actions 4
- 6. Update of the Group Respectful Workplace Code..... 4

1. Introduction

At Lhoist Group, we are dedicated to aligning our actions with our core values of respect, courage, and integrity. These values are the driving force behind our strong commitment to a positive and respectful work environment that upholds our inclusive principles.

This Respectful Workplace Code is designed to ensure that everyone working at the Lhoist Group is treated with respect and we are resolute in preventing all forms of discrimination, harassment, or threats of any kind within the Lhoist Group.

We expect our employees and contractors to uphold our core values and conduct themselves in a manner that fosters a positive work environment. With a firm commitment to treating one another with respect and professionalism, we strive to build a culture of inclusion that embraces Lhoist's Group three (3) G's priorities: Generation, Gender, and Geographics, on a journey to build a Lhoist for All. The leadership and management play a pivotal role in setting an exemplary standard and every employee of the Lhoist Group is expected to apply the same principles in their daily work.

Violations of this Code may result in disciplinary action up to and including termination, in compliance with local laws. However, we believe in growth and improvement, so we are implementing supportive measures tailored to individual circumstances, fostering understanding and adherence to the Code.

The enforcement of the Respectful Workplace Code is always to be read in conjunction with local laws. If there are local laws or regulations that establish a higher or different level of requirement than the Respectful Workplace Code or other internal regulations, we must always act in accordance therewith. Conversely, if the Respectful Workplace Code or internal regulations set a higher or different level of requirement, the internal regulations must be complied with, unless this compliance contravenes local laws.

2. Definitions

The definitions set out key terms as used in this Code. While these definitions provide guidance, it is important to note that the definitions specified by applicable local laws will always take precedence. The Group unequivocally condemns all forms of harassment, discrimination, and microaggression, regardless of how they might be defined locally or interpreted in practice. Our commitment is to foster a respectful, inclusive, and equitable environment for everyone.

2.1. Harassment

Harassment, as per this Code, includes unwelcome verbal, visual, or physical behavior displaying hostility, intimidation, or denigration related to protected characteristics, such as race, color, nationality, disability, beliefs, sexual orientation, age, wealth, pregnancy, or maternity/paternity, political views, and more. It unreasonably interferes with work, creating an intimidating or offensive environment. Harassment can be offensive language, slurs, remarks, gestures, or unwanted physical contact.

2.1.1. Moral harassment

Moral harassment, also known as psychological harassment or emotional abuse, refers to persistent and harmful behaviors in the workplace that are intended or have the effect to intimidate, belittle, threaten, or humiliate an individual. It can involve actions or words that undermine an individual's dignity, self-esteem, and psychological well-being. Moral harassment can manifest itself in various forms, such as verbal abuse, threats, isolation, spreading rumors, or unfair treatment.

2.1.2. Sexual harassment

Sexual harassment refers to any form of harassment that is sexual, including unwanted sexual behaviors like touching or gestures, invading personal space, making sexual comments, jokes, or explicit image content sharing.

2.2. Microaggression

Microaggression refers to subtle everyday behaviors that convey derogatory targeting of a person or group of individuals. It can take the form of comments, gestures, or behaviors, possibly belittling or marginalizing someone's identity. Though seemingly insignificant on itself, such behaviors contribute to an environment perpetuating bias and unequal power dynamics. These can also be unintentional but can still have a harmful impact.

2.3. Discrimination

Discrimination generally refers to treating, directly or indirectly, an individual (or a group of individuals) differently, such as denying them a benefit or providing them with an advantage different to other stakeholder or group of stakeholders without any legitimate reason to differentiate.

3. Reporting process

The following steps are set as a framework for the reporting process, which can be tailored to meet local legal requirements and regional considerations:

3.1. Reporting the Incident

At Lhoist, we are committed to maintaining a culture of integrity, transparency, and accountability. We recognize that the willingness of employees and stakeholders to speak up about concerns is essential to protecting our company, our people and our reputation. Lhoist encourages everyone to report any concerns about unethical, illegal, or unsafe conduct without fear of retaliation.

Multiple Reporting Channels - Lhoist offers multiple reporting channels such as Human Resources, the Group Compliance Officer, or via our dedicated (group / local) whistleblowing systems, which allow for confidential and, if desired, anonymous reporting. The Lhoist group whistleblowing hotline is available 24/7, by email: compliance@lhoist.com.

All reports are treated with the utmost confidentiality. Information will only be shared with those who need to know in order to investigate and address the issue.

For anyone reporting a case, which can include the person directly impacted by the incident or a witness to the same, it is crucial to promptly report the incident to ensure swift action.

Despite the challenges it may pose, when submitting a report, the reporting person is strongly encouraged to furnish precise details concerning the incident, encompassing the date, time, location, any potential witnesses, and a description of the Code's violation. By being as specific and detailed as possible, a comprehensive understanding of the situation can be ensured.

3.2. Initial Internal Process

Upon receiving a report, an internal process, tailored to the circumstances and involving relevant parties as necessary, will be initiated. If warranted external specialized support may also be involved as well, but in all cases the process aims to provide a secure and supportive environment.

3.3. Confidentiality and Non-retaliation

All reports are treated with the utmost confidentiality. Information will only be shared with those who need to know in order to investigate and address the issue.

Lhoist strictly prohibits retaliation against anyone who raises a concern in good faith or participates in an investigation. Any form of retaliation will result in disciplinary action, up to and including termination.

4. Feedback & follow-up

After completing the internal process, appropriate action will be initiated with relevant parties to address the situation. These procedures may be adjusted to meet local legal requirements, especially when confidentiality and/or

anonymity is required. Every employee has a duty to report suspected misconduct. By speaking up, you help Lhoist uphold its values and legal obligations, and you contribute to a safe, ethical, and respectful workplace.

5. Disciplinary Actions

Disciplinary processes and measures under this Code are guided by local laws and regulations, especially in cases of proven incidents or non-compliance. The severity and frequency of misconduct, alongside local legal requirements, will determine specific disciplinary actions. Disciplinary actions can go from verbal or written warning or additional disciplinary measures up to and including termination. These measures aim to uphold a safe and respectful work environment, deterring unacceptable behavior while ensuring fairness and compliance, in accordance with applicable local laws.

Reports must be made in good faith, meaning you genuinely believe the information is true. Deliberately making false or malicious allegations of policy transgressions is a violation of this Code and will result in disciplinary action.

6. Update of the Group Respectful Workplace Code

This Respectful Workplace Code will undergo regular evaluations and may, at regular intervals, be updated.