



CSR

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Public document

## HUMAN RIGHTS POLICY

Edenred is a leading digital platform for services and payments and the everyday companion for people at work, connecting more than 60 million users and over 2 million partner merchants in 45 countries via close to 1 million corporate clients.

Edenred offers specific-purpose payment solutions for food (such as meal benefits), employee engagement (such as gift cards, and employee engagement platforms), mobility (such as multi-energy including EV (Electric Vehicle) charging, maintenance, toll, parking), and corporate payments (such as virtual cards).

True to the Group's purpose, "Enrich connections. For good.," these solutions enhance users' well-being and purchasing power. They improve companies' attractiveness and efficiency and vitalize the employment market and the local economy. They also foster access to healthier food, more environmentally friendly products, and more sustainable mobility.

In 2024, Edenred's 12,000 employees are committed to making the world of work a connected ecosystem that is safer, more efficient, and more responsible every day. Operating in 45 countries, with a representation of over 87 nationalities, Edenred is multicultural and diverse by nature. Edenred ensures a safe, fair, and open work environment where our talents thrive, working creatively and in confidence.

Edenred contributes to the development of people in the countries where it operates and is convinced that to grow respectfully, it is necessary to ensure that human rights are respected and protected.

### ▶ EDENRED FUNDAMENTALS

This Human Rights Policy applies to all our employees worldwide. All employees, from executives, managers to newcomers are responsible for knowing, abiding by, and communicating our commitments regarding human rights. All Edenred employees must respect Edenred's commitments. It is everyone's responsibility to understand and commit to all the mandatory principles set out in this Human Rights Policy.

For our suppliers, please refer to the Supplier Charter published in December 2023.

All Edenred employees must commit to respecting human rights as defined in the Universal Declaration of Human Rights and adhere to the UN Guiding Principles on Business and Human

Rights. According to the United Nations Global Compact definition, *“The idea of human rights is as simple as it is powerful: that people have a right to be treated with dignity. Human rights are inherent in all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, color, religion, language, or any other status. Every individual is entitled to enjoy human rights without discrimination. These rights are all interrelated, interdependent, and indivisible.”*

The actions taken by Edenred and its performance in areas covered by these guidelines are published every year in its Communication on Progress report, available on the United Nations Global Compact website.

All Edenred employees must comply with the principles and fundamental rights outlined in the fundamental conventions of the International Labor Organization (ILO) and the UK Modern Slavery Act, which cover:

- freedom of association and the effective recognition of the right to collective bargaining,
- elimination of all forms of forced or compulsory labor,
- effective abolition of child labor,
- elimination of modern slavery including human trafficking,
- elimination of discrimination in respect of employment and occupation, including sexual and non-sexual harassment.

All Edenred employees must prohibit discrimination, forced, illegal and, child labor and are committed to safe and healthy working conditions, individual dignity, as clear wages and benefits and respect for privacy. The right to freedom of association, collective bargaining and expression are respected.

## **▸ WHY HAS EDENRED UPDATED THIS POLICY?**

In 2016, Edenred updated its Charter of Ethics, which defines the conduct expected from its employees, partners, and suppliers. At the end of 2023, 100% of eligible Edenred employees had acknowledged the Charter of Ethics.

In 2018, an analysis of extra-financial risks, including human rights risks, was carried out in the Group's 45 countries. The results of this analysis did not identify any significant human rights risks. In 2023, Edenred's double materiality analysis did not identify any major human risks for employees.

However, aware of its impact and engaged to protect employees, Edenred has decided to go further by creating a Human Rights policy for its employees. Once again, it is important to remember that Edenred is setting a framework with this Human Rights Policy, but it is the responsibility of each one of the Group's employees to apply and share these key principles.

- In this policy, the scope of application is all full-time and part-time employees of the Group and its entities worldwide.
- This policy consolidates the existing commitments present in the Ethics Charter (which every employee must have read and signed) and brings clarity to our processes and procedures.
- Where there is national law and international human rights standards, it's important to commit locally with the national law and promotes the higher standard when possible.
- The Human Resources Department is responsible for ensuring that Human Rights are respected worldwide.

## **EDENRED'S PRINCIPLES**

### **ANTI-DISCRIMINATION**

Diversity and inclusion are sources of value and performance. Edenred's Charter of Ethics reaffirms its commitment to forbidding any form of discrimination about gender expression, age, family situation, origin, sexual orientation, physical abilities and appearance, or membership in a political, religious, or labor organization. Aware that the diversity of its employees is a strength and asset, Edenred launched a global diversity action plan in 2019. It's important that all Edenred employees have the same access to growth opportunities. The action plan is supported and coordinated at the highest level within the Group and includes a set of individual and collective commitments relating to recruitment, unconscious bias, training, and talent management.

In compliance with locally applicable legislation, all Edenred Group employees are committed to providing a workplace free from harassment and unlawful discrimination. This applies to hiring and employment practices such as salaries, promotions, rewards, access to training, dismissals, and retirement. It is the responsibility of every employee to provide to all employees the best possible work-life experience.

No discrimination practices are accepted. In case of suspected incidents of Human Rights abuse, the Edenred HR teams are committed to investigating and action is taken when necessary. We apply fair, reasonable, and legal disciplinary practices.

All our job offers include the following statement: "Edenred is all about meritocracy. You come as you are, and you contribute. Indeed, Edenred recognizes, recruits, and develops all talents and singularities. We are committed to preventing all forms of discrimination and to providing all our candidates with equal opportunities regardless of their gender and gender expression, disability, origin, religious belief and sexual orientation, or any other criteria".

### **FIGHT AGAINST FORCED AND ILLEGAL LABOR**

Edenred does not tolerate any form of forced or illegal labor, i.e., any work or service performed under threat or without the consent of the person concerned. Every employee of the Edenred Group has the right to freely terminate their employment contracts, subject to reasonable notice, in compliance with local laws and with the clauses of their contract, at any time and without penalty.

Every employee must have a valid employment contract. They are all written and transparent and include comprehensive provisions for employees (including salary, hours, benefits, and adapted to the language spoken).

### **FIGHT AGAINST CHILD LABOR**

All Edenred employees prohibit the employment of persons under the minimum age for employment as defined by local law, or who have not completed their years of compulsory education, and, under any circumstances, who are below 15 years of age<sup>1</sup>. The age of employees

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<sup>1</sup> Except short term internship in some countries

is verified at the time of hiring, when they are asked to provide copies of official documents showing their name, age, and photo. This information is kept in the employee's personal file.

It is everyone's responsibility to strictly respect the minimum age for child labor in all the countries where Edenred operates. In all cases, this minimum working age will never be lower than the age specified in Conventions 138 and 182 of the International Labor Organization, i.e., 15 years, and 18 years for dangerous or particularly challenging work. If local legislation sets a higher minimum working age, or if compulsory schooling is longer, this limit applies.

All relevant laws must be respected for young workers (for example, those between the minimum working age and the age of 18), including regulations relating to hiring, working conditions, types of work, working hours, proof of age documentation and overtime.

#### **▸ WAGES & BENEFITS - COMPENSATION, WORKING HOURS, VACATIONS, AND BENEFITS**

Edenred ensures that:

- the normal working week is limited to 48 hours effective hours (or less, depending on local law, collective agreements, or branch agreements).
- employees are entitled to reasonable breaks when working. They may use the toilet whenever necessary, not just during designated breaks.
- no salary is lower than the applicable legal minimum.
- all employees receive a pay slip, and wages are paid into employees' accounts at regular intervals.
- overtime is compensated by overtime pay or compensatory time off, based on local laws and regulations.
- employees are entitled to at least 24 consecutive hours' rest for each seven-day working period, or 48 hours' rest for each fourteen-day period.
- specific leave entitlements: application of national paid vacations in accordance with local labor laws and, in some countries, depending on the employee's employment contract, the possibility of paid days not worked.

It is the responsibility of HR and local managers to ensure that these practices are respected.

#### **▸ FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING**

Collective bargaining is one form of social dialogue, Edenred respects the ILO in all countries in compliance with the law in force.

Collective bargaining procedures are regularly set up with employee representatives, to deal with issues relating to working conditions. Thanks to these regular meetings, management informs them in advance, within a reasonable time, of any future changes to Edenred's operations likely to affect employment, such as mergers or redundancy plans.

All Edenred employees are free to be accompanied by the staff representatives of their choice for any disciplinary or related meetings.

Edenred prohibits all forms of discrimination against employee representatives. Effective grievance mechanisms are in place to resolve internal disputes and employee complaints. Edenred supports effective, respectful and transparent communication between employees, their representatives and management.

## ▸ FREEDOM OF EXPRESSION

Edenred employees are free to express their individual opinions both inside and outside the workplace, subject to their duty of loyalty to Edenred and the need to protect the Group's reputation and maintain an inclusive working environment.

Freedom of expression may be limited by defined criteria such as safety, health, smooth running of the business, and respect for human dignity and diversity of opinion. Forceful imposition of personal beliefs and expressions of hatred are contrary to Edenred's values and are prohibited.

## ▸ WORK CONDITIONS: HEALTH AND SAFETY AT WORK

Edenred is committed to providing a safe and healthy workplace to prevent accidents and damage to health arising from, connected with, or occurring in the course of work or because of the operation of the employer's facilities. Edenred is also involved in employee well-being, particularly the subject of ergonomics in the workplace or mental health, which also includes stress in the workplace. This subject is dealt with and applied locally by the people responsible for it, very often the HR teams. All Edenred employees are also engaged to contribute to this safe and healthy environment.

Edenred takes a proactive approach to health and safety, implementing policies, systems and trainings designed to prevent accidents and injuries and protect the health of its employees. Edenred's approach is conducted in consultation with employee representatives and encourages the implementation of employee training and awareness-raising initiatives. Experts are also brought in to certify the conformity of facilities, or to advise employees on health matters. The Edenred group sets a framework for working conditions. It is everyone's responsibility to be aware of these principles and to respect them in their day-to-day work.

First-aid kits and fire extinguishers are readily available in the workplace, and emergency exits are clearly marked and uncluttered. Employees are regularly approached by local HR departments for training on all these subjects. Edenred tracks the number of trained employees.

The travel policy assistance is regularly reviewed for employees, expatriates, and their families to reinforce their protection. Employees must do a specific training module on the right behaviours to adopt in certain high-risk countries. Every employee needs to be fully aware of this before a trip.

Health and safety incidents, particularly near-misses, must be reported and investigated, where appropriate, via the health & safety monitoring system, to improve health and safety and prevent their recurrence. Edenred monitors the incident frequency rate.

In a work-related accident, employee will receive first aid and support in their medical follow-up. Health and safety incidents are monitored (lost time and incident frequency rate are declared publicly every year).

All employees have the right to withdraw from any situation where there is an imminent danger of accident, without asking permission from management. Failure to comply with health and safety standards may result in disciplinary action.

## ▸ VIOLENCE & HARASSMENT

Edenred does not tolerate practices such as inhuman treatment, physical punishment, insults, harassment or mental or physical coercion. The right to respect and human dignity is a key principle.

All Edenred employees are informed of their obligations to refrain from any violent, threatening, or abusive behaviour, and managers are trained in managerial techniques to combat such behaviour, and to identify and deal with situations of harassment.

## ▸ RESPECT FOR PRIVACY

Each Edenred employee must respect the privacy of all the employees when collecting personal data or monitoring the workplace.

Edenred has a procedure that spells out which forms of data collection and management are authorized, what personal data of employees is kept, where it is stored, how it can be accessed, and why it is necessary to keep this data.

Employees are informed of any workplace surveillance and the reasons for such activity.

Edenred does not collect information about people with whom employees have confidential relationships without the prior written consent of the employee concerned. Each employee must respect this when requesting data from Edenred employees.

## ▸ GOVERNANCE

Edenred's commitment to respect Human Rights is supported at the highest level of the Company by our Chief Executive Officer, with Human Rights being regularly discussed at the Executive Committee and Board level.

The Executive Vice-President of Human Resources & Corporate Social Responsibility, who is a member of the Executive Committee, is responsible for overseeing the adherence of Human Rights in the Group. On top of the global HR team, the Global ESG and Sustainable Development Director and the Group Safety Director have an appropriate budget and a dedicated team which sets the global Human Rights strategy and supports its coordination and implementation throughout the Group. At the local level, each HR Director or local Manager oversees the implementing and fostering of all these principles and rules. We work together to embed human rights in our day-to-day operations, to ensure respect and fulfilment of human rights as per international standards and as mentioned herein.

And of course, as indicated at the beginning of this document, it is essential for every Edenred employee to be aware of this policy, understand it and undertake to follow it.

Employees can take various steps through different channels and people to express their concerns or make a report:

- By talking to their line manager or someone in the Legal, Compliance and Regulatory Affairs
- By contacting the Human Resources Department directly
- By contacting their local contact person (e.g.: Disability Contact Person in head office HR teams) or their employee representative where one exists (e.g.: Harassment Referent at head office)

- By contacting the Safe Channel alert line. Please find below how Edenred collects and process its alerts:

Edenred provides its employees with mechanisms for collecting and processing reports, notably via the Safe Channel ([link here](#)), available 24/7 in 17 languages.

We encourage the effective use of these mechanisms so that all Edenred employees can report incidents of suspected human rights violations. Confidentiality and protection against reprisals are guaranteed to anyone using these mechanisms in good faith. The policy on the Collection and Processing of Reports, as well as the present policy, are available in several languages.

Edenred undertakes to apply fair, reasonable, and legal disciplinary measures. The Safe Channel allows employees to report any potentially inappropriate behavior securely and anonymously.

- By contacting the Group Safety Director directly. He organizes and drives the Safety and Security strategy across all Group entities. The strategy is currently being rolled out via correspondents in the various entities, considering their needs, local practices, and the legal and regulatory framework.

All reports should be made in good faith. Any report of suspected human rights infringements or adverse human rights impacts will be carefully reviewed by the Group, within a reasonable timeframe, and addressed promptly and appropriately. Individuals making such reports in good faith will not be subject to retaliation, threats or harassment, and their identity will be held in confidence to the extent possible and as permitted by law. When a report is well-founded, appropriate measures such as preventive and/or disciplinary measures will be taken where necessary, regardless of the individuals concerned, and in accordance with the law and/or Policy on Disciplinary Measure.

This policy is continually evaluated and reviewed to strengthen our approach to addressing human rights, including labor rights, and relies on all its employees to apply them locally.

FEEDBACK is welcome
Edenred is keen to receive feedback from internal and external stakeholders.
If you wish to share feedback or would like to discuss this report, please reach out to <a href="mailto:contact-csr@edenred.com">contact-csr@edenred.com</a>
If you wish to bring up any Human Rights related issue, please use the <a href="#">Edenred Safe Channel</a> .

## Version history

Version	Date	Author	Approval	Level of confidentiality
1	10/12/2024	HR &CSR Department	CEO	Public document for external and internal use

## ▶ EXTERNAL RESSOURCES

[The UN Guiding Principles on Business and Human Rights.](#)

[The UN Global Compact.](#)

The fundamental conventions of [the International Labor Organization \(ILO\)](#) and specifically:

- ▶ ILO CONVENTIONS NO. 1 AND 30
- ▶ ILO CONVENTIONS NO. 26 AND 131
- ▶ ILO CONVENTIONS NO. 87, 98 AND 135
- ▶ ILO CONVENTIONS NO. 100 & 111
- ▶ ILO CONVENTION NO. 105
- ▶ ILO CONVENTIONS NO. 138 AND 182
- ▶ ILO CONVENTION NO. 155
- ▶ ILO CONVENTION NO. 190

[The UK Modern Slavery Act.](#)