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## **POLICY DOCUMENT**

### **Human Resources Policy**

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## 1. BACKGROUND AND PURPOSE

This Human Resources Policy (the “**Policy**”) for Catena Media Plc. (the “**Company**”) and its subsidiaries (jointly referred to as the “**Catena Group**”) has been developed to ensure that the Catena Group is in compliance with applicable laws and regulations and that the Group’s values and desired ways of conducting business are communicated and followed throughout the entire organization, the Group has developed a number of governing documents, including this policy.

## 2. AUDIENCE

This Policy applies to all directors, employees, independent contractors, founders on earn-out and other similarly contracted workers with managerial responsibilities and the Catena Group’s HR departments (collectively known as “**Relevant Persons**”).

## 3. POLICY STATEMENT

### 3.1. EQUALITY, DIVERSITY & INCLUSION

The Catena Group believes in providing equal opportunities for employment, training, and career advancement. Our fundamental principle is equal pay for work of equal value, regardless of sex, gender, identity, background, or any other characteristic. We strive to build a diverse and inclusive organisation that represents a broad range of perspectives and experiences. Catena Group is an equal opportunity employer, committed to providing a safe and respectful work environment, where everyone is treated with respect and dignity. All Relevant Persons have a responsibility of safeguarding and upholding the guidelines articulated in this policy in any situation related to employment, including work-related events and conferences etcetera. The Catena Group will do so by ensuring that any decision is made on the basis of predefined criteria such as business requirements, personal aptitude, skills, experience, qualifications and personality as fitting the specific role, where applicable.

### 3.2. ANTI-DISCRIMINATION

The Catena Group provides equal opportunities irrespective of sex, gender, sexual orientation, ethnicity, religion or other belief, disability, gender identity, military or veteran status, or age. This applies to all directors, employees (including interns, apprentices, trainees, and third party hired), independent contractors, founders on earn-out and other similarly contracted workers (collectively known as “**Relevant Persons**”), applicants for employment or promotion, suppliers, customers and members of the public with whom we come into contact. We value diversity.

Relevant Persons from varied backgrounds enrich the Catena Group’s culture and support our commercial success. We will not tolerate discrimination, sexual, physical or psychological harassment or victimisation (including bullying) of our Relevant Persons. Everyone working for the Catena Group, particularly those in a management position, have a responsibility in their daily work to ensure compliance to these commitments. For more information refer to the Equal Opportunities and Dignity at Work policy.

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### **3.3. WORK ENVIRONMENT, HEALTH AND SAFETY**

The Catena Group wishes to express its commitment to the provision of the highest standards of health and safety, as part of its recognition that the Catena Group's most valuable asset is its Relevant Persons.

There can be no compromise with safety. Relevant Persons must strive to keep the company and its premises a safe and healthy place to work and to do business, at all times, for everyone. This general statement underlines the Company's fundamental belief in the importance of health and safety, its commitment to providing an injury free workplace, its concern to maintain the physical and mental well-being of its Relevant Persons, to provide a safe working environment and to eliminate, or control, hazards.

Relevant Persons are expected to take responsibility for health and safety in their daily work and work to continuously improve the working environment, in any office premises and in all remote locations.

Relevant Persons with managerial responsibilities (the "Managers") have the responsibility for ensuring the well-being of the Relevant Persons, including a reasonable workload in compliance with national labour laws. The resources must be adapted to the requirements of the work. To allow for recovery, managers must either change the way of work or change priorities.

The Catena Group ensures that necessary measures for the safety and health's protection of workers are taken, including monitoring and prevention of occupational risks.

### **3.4. RECRUITMENT**

The Catena Group's most valuable asset is its Relevant Persons. To ensure our competitive advantage and maintain a business oriented and winning company culture it is crucial to attract, screen and recruit the right people with the right values, competencies and skills.

As described in section 3.1, "Equality, Diversity & Inclusion", the Catena Group is an equal opportunity employer. All recruitment and selection procedures and decisions will reflect our commitment to providing equal opportunity by assessing all potential candidates according to their skills, knowledge, qualifications and capabilities. No regard will be given to the factors such as sex, gender, sexual orientation, ethnicity, religion or other belief, disability, gender identity, military or veteran status, or age.

When it becomes necessary to recruit for a position, Managers should refer to the job description to establish the requirements for the position, and the key selection criteria for the position. If no job description exists for the available position, or if it requires revising, this is the responsibility of the appropriate Manager.

The conditions of employment offered to the Relevant Persons must meet the minimum requirements in national law and/or collective agreements. Catena Group Relevant Persons are entitled to form or join a trade union, where relevant, and we respect the rights of our Relevant Persons and their trade unions to negotiate collective agreements.

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### **3.5. DEVELOP & RETAIN**

The Catena Group encourages all Relevant Persons to continually pursue excellence in their occupation by participating in various programs. Training and Development programs shall be provided pending the availability of funds each year. These programs are coordinated by Human Resources.

Relevant Persons are urged to complete academic degrees and professional courses in order to better perform their duties and responsibilities and promote their own personal growth. Continuing professional pursuits will increase their job commitment and satisfaction and will prepare them for positions with greater responsibility and importance to the Catena Group and the achievement of its goals.

#### **3.5.1. Formal Performance Management and Competency Development**

Our Relevant Persons dialogues are both reflective and forward-looking, focusing on reviewing recent progress and planning for future development. Catena Group applies an agreed process where Relevant Persons, twice a year, complete a self-evaluation and based on that, receive manager or team leader feedback.

This process enables managers to discover skills and competencies gaps. Should such gaps exist, managers can seek support and guidance from HR in order to develop necessary skills or competency plans to ensure that the right skills and competencies are developed to support business objectives.

#### **3.5.2. On the Job Training and Informal Feedback**

Catena Group believes that the most important competence development happens “on-the-job”, and continuous follow up and feedback to supplement the formal performance and competence development process. All Managers are accountable to provide ongoing feedback to their Relevant Persons, as well as required on the job training and coaching to ensure ongoing improvement and development.

### **3.6. COMPENSATION AND SALARY REVIEW**

Catena Group attracts, retains and motivates Relevant Persons through the use of correct and fair compensation and benefits. We apply industry-based compensation determination in accordance with our commitments to equality, diversity and inclusion, and in compliance with labour laws and collective agreements.

Salaries and bonuses are reviewed each year and are only available to the Catena Group’s employees. Off-cycle increases may happen where an employee is in a role where the market has shifted significantly, been promoted, or taken on more responsibility or changed roles since the last review. In companies with collective bargaining agreements, salary reviews can occur at other times. Salaries are adjusted primarily based on performance and the achievement of individual goals.

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### **3.7. TERMINATION AND DISCHARGE**

The Catena Group has the ambition to avoid or minimize terminations of Relevant Persons through good working practices, as described in this policy. Although, when this occurs, Catena Group works in close cooperation with unions where relevant, and works councils to manage separation and termination in accordance with local employment protection laws in all operating countries. The discharge of personnel demands extensive involvement and expertise, specifically knowledge in local labour law. The Human Resources Department is accountable for ensuring that the process for Relevant Persons separation is conducted in accordance with the national laws. HR must be informed in all cases of termination or discharge.

For all positions, exit interviews shall normally be conducted by the department's relevant HR Business Partner. The purpose is to gather data on the Relevant Persons role, work environment and the organization – all valuable information on how to retain Relevant Persons. This material may also be used in concert with Relevant Persons satisfaction surveys – exit interviews are a rich source of information for organisation improvement.

The responsible manager is accountable to ensure that the transfer of knowledge to the organization and making sure that the Relevant Persons have documented the important parts of his or her tasks to facilitate the replacement.

## **4. PRIVACY AND PERSONAL DATA**

The Company takes data protection seriously and every individual within the Catena Group is responsible for protecting personal data about each other as well as that of our customers, business partners and suppliers.

It is important for the Company that Relevant Persons feel comfortable with how we handle their personal data. We protect personal data. That is why we are open about how we collect, process and share the personal data we store.

We process personal data in line with the applicable Data Protection laws, the principles set out in the Company's Data Protection Policy and the Employee/Freelancer/Consultant Privacy Notices, as applicable from time to time.

## **5. ANTI-BRIBERY AND ANTI-CORRUPTION**

The Company has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery and corruption.

The Group is committed to upholding all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by national laws and relevant international laws in respect of our conduct both at home and abroad.

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The principles and rules set out in the Company's Anti-Corruption and Bribery Policy apply.

## **6. INSURANCE**

### **6.1. HEALTH INSURANCE**

All Catena Group employees are offered personal health insurance, the policies are administered by the local HR department as they are country specific.

### **6.2. TRAVEL INSURANCE**

The Management team have permanent international travel insurances, other Relevant Persons, if booked through Catena Group's office administrators will have each trip covered.

### **6.3. COMPANY INSURANCE**

Catena Group has through its corporate insurance cover for Employer's Liability.

### **6.4. DIRECTORS' INSURANCE**

Board of Directors are covered through a separate Directors and Officers Liability insurance taken out by Catena Media Plc in Malta.

## **7. TRAVEL**

All travel at Catena Group must be well planned, serve a business purpose, be approved by an executive manager, and be conducted according to local guidelines. When a meeting requires you to travel, it is the Relevant Persons responsibility to select the most cost-efficient choice, and to obtain the required preapproval by the respective manager. The Travel & Expenses Procedure should be adhered to for any company travel.

## **8. WHISTLEBLOWING/REPORTING NON-COMPLIANCE**

All Relevant Persons are advised to report any non-compliance to these commitments to their manager or the HR department or through the Company's Whistleblowing tool. The Whistleblowing tool can be accessed on the company intranet site. All communications will be investigated as appropriate and operated with due regard for privacy of the individual and in line with the principles outlined in the Company's Data Protection Policy and kept confidential, unless such communications must be made available to a law or enforcement agency or other public authority based on a legal obligation or to establish or defend the Company's or an individual's rights.

No Relevant Persons acting in good faith will be subject to disciplinary measures for providing information regarding suspected violations of law or the Company Policy.

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## 9. ROLES AND RESPONSIBILITIES

All Relevant Persons are individually responsible for ensuring their adherence to this Policy.

The Chief Human Resources Officer is responsible for reviewing and updating this Policy.

The CEO is the overall owner of this Policy.

## 10. REVIEWS AND UPDATES

The Human Resources Policy shall be reviewed, updated and adopted when deemed necessary or appropriate, however, no less than annually.

The Human Resources Policy shall be reviewed and updated by the Chief Human Resources Officer and adopted by the Board of Directors.

## 11. REFERENCES TO ASSOCIATED DOCUMENTS

12. Information Security Policy
13. Data Protection Policy
14. Anti-Corruption and Bribery Policy
15. Equal Opportunities and Dignity at Work Policy
16. Employee/Freelance/Consultant Privacy Notices
17. Travel & Expenses Procedure

All Policies mentioned above can be accessed [here](#).