

Responsible: CEO  
Implemented January 2019, updated October 2022

## Nilorn Human Rights Policy

Nilorn's approach to human rights is based on UN Guiding Principles on Businesses and Human Rights and the "Protect, Respect and Remedy" framework. Our Code of Ethics and Business Conduct sets out our common framework around how we are expected to behave and to do the right thing.

The Human Rights policy applies to all Nilorn employees and employees of subsidiaries. It also applies, as far as reasonably achievable, to our upstream and downstream supply chain through suppliers and business partners.

The policy is approved by the Board.

### Human Rights Statement

As a globally operating company we recognise our responsibility to respect international standards and practices, such as those of United Nations (UN) Universal Declaration of Human Rights and Fundamental Rights at Work by International Labour Organisation (ILO). Our commitment to operating with respect for Human Rights is reflected in company policies and procedures.

We seek to play an active role in the promotion of Human Rights and to work proactively to respect the rights that all people are entitled to basic rights and freedoms, regardless of nationality, gender, religion, race or any other status. Nilorn aim to avoid causing or contributing to adverse human rights impacts in areas which we can directly influence, through our management control and addressing such impacts if they occur. Wherever possible, we also strive to identify, prevent or mitigate adverse indirect human rights impacts that may be linked to our operations, products and services through business relationships. Nilorn has zero tolerance to slavery and human trafficking.

Nilorn is a signatory of the UN Global Compact.

### Key stakeholders

#### Employees

Nilorn seeks to respect the human rights of all employees within the Nilorn Group as well as complying with all national laws. We have complaint procedures described in the Public Interest Disclosure "Whistleblowing" Policy. If any employee believes that someone is violating the Human Rights Policy or the law, they are asked to report it immediately to their manager or the whistleblowing system.

#### Suppliers

Nilorn seeks to do business with suppliers who share similar values and respect human rights. We require our suppliers to take actions that are consistent with the Nilorn Supplier Code of Conduct. Suppliers, including labour agencies and recruiters, are required to have processes in place to ensure

SWEDEN BANGLADESH BELGIUM CHINA DENMARK ENGLAND GERMANY HONG KONG INDIA ITALY PAKISTAN PORTUGAL SWITZERLAND TURKEY USA



that they do not take part in human trafficking or modern slavery. The Supplier Code of Conduct requirements are based on the ETI Base Code, the ETI Base Code is founded on the conventions of the International Labour Organisation (ILO).

The process to evaluate and address specific risks of human trafficking and slavery on our product supply chain shall be based on the SMETA methodology (Sedex Members Ethical Trade Audit) and is described in the Nilorn's Due Diligence Procedure for Responsible Business Practices. Suppliers are informed about the available whistleblowing system.

### Communication and training

We will regularly review and update the progress on our efforts and our performance is communicated in our annual sustainability report. Through our participation in UN Global Compact we also publish a Communication on Progress once per year.

The management team is responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly. All employees receive an induction into the business where our policies, procedures and expectations are outlined. As a responsible business, it is essential for employees to understand why respect for human rights is so important. Training and awareness-raising are therefore central to embedding this approach.

### References

UN Universal Declaration of Human Rights <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

International Labour Organisation's Core Conventions <http://ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

Guiding Principles on Business and Human Rights  
[https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

OECD Due Diligence Guidance for Responsible Business Conduct  
<https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>