



Gunnebo Group Human Rights Policy

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1 Introduction

This Human Rights Policy (the “**Policy**”) applies to Gunnebo Group and all its entities (the “**Gunnebo**”).

The Policy applies to employees and other contractors of Gunnebo and its board of directors when they act in their capacity as directors of Gunnebo.

It shapes our expectations of suppliers, business partners and, as well as our engagement with communities and customers.

2 Gunnebo’s commitment to Human Rights

This Human Rights Policy formalizes Gunnebo’s commitment to respect the internationally recognized human rights, which means not to infringe on people’s rights and to address the adverse human rights impact that Gunnebo may be related to in their operations, products, or services through their business relationships.

At Gunnebo we strive towards equity, dignity, decent work, health, and safety in relation to our own workforce and workers in the supply chain. This Policy is our compass to guide us in our corporate human rights work at the global, local and operational level. To achieve this ambition, we at Gunnebo recognize the importance of engaging with all our stakeholders.

Gunnebo is committed to preventing and avoiding any negative impact on human rights, whether through its own operations or through activities connected to its business relationships. Furthermore, Gunnebo pledges to use its position as a market leader to influence and encourage the protection and fulfillment of human rights across its network of business relationships.

This Human Rights Policy applies to all Gunnebo Group entities, employees and other contractors of Gunnebo and its board of directors when they act in their capacity as directors of Gunnebo.

Gunnebo is committed to encouraging its stakeholders to uphold the principles in this Policy and to adopt similar policies within their operations.

3 Compliance with laws and other standards

Gunnebo conducts its business with integrity, engagement, and high ethical standards and thus we are committed to comply with all applicable and relevant legislation of the countries and markets where we

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operate, as well as other international human rights instruments and standards that Gunnebo has committed to.

Compliance with laws and requirements established in internationally recognized instruments to which we adhered to, are considered minimum requirements for our human rights approach.

- UN International Bill of Human Rights [International Bill of Human Rights | OHCHR](#)
- ILO's eight fundamental conventions [ILO Declaration on Fundamental Principles and Rights at Work | International Labour Organization](#)
- UN Global Compact [The Ten Principles | UN Global Compact](#)
- Un Guiding Principles on Business and Human Rights [Intro_Guiding_PrinciplesBusinessHR.pdf \(ohchr.org\)](#)
- OECD Guidelines for Multinational Enterprises [Responsible business conduct | OECD](#)
- Children's Rights and Business Principles [Children's Rights and Business Principles | UNICEF](#)

Gunnebo seeks to avoid causing or contributing to adverse human rights impacts through its business activities, and to take steps to address such impacts when they occur.

Gunnebo also takes steps to prevent or mitigate adverse human rights impacts that are directly linked to Gunnebo through its business relationships. For more information, see Gunnebo's Supplier Code of Conduct.

In cases where applicable law and international human rights standards differ, we strive to follow the higher standards while complying with applicable laws. In case of a direct conflict between applicable law and international human rights, we will adhere to applicable law while seeking ways to respect human rights to the greatest extent possible.

Gunnebo is committed to include this Policy as a guide in the selection of its business partners.

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4 Our Human rights risk assessment processes

4.1 Identifying and assessing actual and potential human rights impacts

We perform human rights risk assessments on an ongoing basis, as well as when we enter into new business relationships or when our operating conditions change, as these changes may give rise to new potential or actual human rights impacts.

We regularly engage with employees, communities, workers, and other stakeholders to ensure that their perspectives inform our decisions, and we take all appropriate measures to protect stakeholders with whom we engage from violence, intimidation or other acts of retaliation. Where it is not reasonably possible for us to engage effectively with stakeholders, we seek to consult with experts who can provide credible insights into actual or potential adverse impacts. We also make use of information gathered through the notification mechanism and the complaints procedures set out in Section 9.

4.2 Prioritisation

We prioritise our efforts to address human rights risks based on the following:

- Severity: as determined by scope (number of individuals potentially affected), scale (gravity of impact, e.g. loss of life), and irremediability (ease of restoring/remedying prior enjoyment of rights, i.e. the possibility of restoring affected people to their prior state of well-being); and
- Likelihood: the risk of such negative effects actually occurring.

5 Commitments

As Gunnebo operates globally, our ambition on Human Rights goes beyond compliance with existing regulations. We want to ensure that Human Rights play an influential role in our operations and in our relations with external stakeholders. Providing health, safety, decent work conditions and level of income needed for covering the necessities for food, housing, healthcare and child support or so-called living wages. as well as promoting inclusion and equity for all our workers are our principal commitments.

Considering that there are new issues constantly raised and growing awareness and familiarity within the business of how human rights impact our decisions, our policies and practices are regularly updated.

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5.1 Own workforce

At Gunnebo, the working conditions of our employees are, at minimum, in compliance with internationally recognized labour standards, and the laws of the countries we operate in. This includes the prevention of child and forced labour, adherence to the principle of non-discrimination in the workplace, the right of freedom of association and assembly, and the right to collective bargaining.

5.2 Legal employment

Gunnebo is committed to UN Convention on the Rights of the Child and ILO's eight fundamental conventions.

Gunnebo does not allow or tolerate child labour or any form of modern slavery in our operations or through our value chain. Modern slavery includes forced, bonded or compulsory labour, physical or psychological punishment or human trafficking.

This means, among other things, that no one should be conducting work for the benefit of Gunnebo that (i) they have not voluntarily accepted based on mutually agreed, true and transparent conditions; (ii) is performed under any form of direct or indirect mental, physical or financial coercion, threat of any penalty or sanction; or (iii) which in any other way exploits the vulnerability of the worker. No worker should pay any form of recruitment or employment eligibility fee or have to hand in identification papers or work permits as a condition for payment.

We do not employ anyone younger than 15 years or, if higher, the legally prescribed minimum work age. We do not allow persons under the age of 18 to perform hazardous work (i.e., work that is mentally, physically, socially or morally dangerous or harmful, including night shifts), any of the other worst forms of child labor, or work that interferes with mandatory schooling.

Gunnebo employees are responsible for ensuring that modern slavery is not present at any stage in the production of our products.

We expect our business partners to support and respect the protection of internationally recognized human rights and adhere to at least the same standards as set out above.

As an organization, we are committed to an ongoing risk management process to identify, prevent, mitigate and account for how we address any potentially adverse human rights impacts of our business.

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5.3 Freedom of association and collective bargaining

Gunnebo strives to maintain good communication with each employee through varied channels and procedures, as well as recognising the right for employees to organise their right to collective bargaining and agreements.

We promote clear and transparent information and consultation procedures for employees and management to facilitate constructive dialog and effective communication.

We acknowledge and respect the right of our employees to form or join any legally recognized unions or associations, as well as to choose their representatives, to bargain collectively and to strike.

Worker representatives should not be in any way discriminated against and should have full access to perform their representative functions.

5.4 Working conditions

Being valued and treated respectfully helps to promote a positive work culture in which employees are fulfilled, loyal, engaged and motivated to perform at their very best. At Gunnebo, we should treat colleagues and all other shareholders with mutual respect. Respect should be understood as accepting somebody for who they are, even though they are different from you or do not agree with you.

We do not tolerate:

- Bullying, intimidation or threatening behaviour
- Offensive or inappropriate behaviour
- Any form of discrimination
- Physical safety- in the plants and working areas- goal is no injuries or risk for life

Gunnebo complies with all relevant labour laws, standards and regulations, including those relating to remuneration practices, working hours restrictions and provision of leisure time.

Remuneration for work should, as a minimal requirement, comply with all relevant laws and standards, including those relating to minimum living wages, overtime, statutory benefits and paid vacation.

Each employee shall be rewarded in a correct and fair manner in accordance with their individual performance and contribution to the success of Gunnebo.

We respect our employee´s working and leisure hours. No employee should work beyond the maximum permitted hours.

We strive to maintain and encourage a healthy work-life balance for our employees.

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We also aim to provide working place absent of rude or degrading treatment.

We aim to ensure that our facilities are accessible for people with disabilities.

We strive to provide maternity protection to our employees.

Gunnebo is committed to providing safe and healthy working conditions by controlling the risks associated with its processes and thereby ensuring compliance with relevant health and safety laws and regulations. We are committed to zero fatalities at the workplace and any work-related injuries or ill health amongst employees. We have a strong belief that employees who feel good, perform well, and therefore, in addition, we provide well-being activities.

6 Human Rights Management systems

In alignment with the UN Guiding Principles on Business and Human Rights, our approach to Human Rights Due Diligence (DD) involves four key steps:

1. Evaluating both current and potential impacts on human rights related to our ongoing and future business operations.
2. Incorporating the findings from our DD process into our activities and taking necessary actions.
3. Monitoring the effectiveness of our DD Measures; and
4. Sharing information on how these issues are being addressed, including ongoing consultations with external stakeholders and those affected.

Our commitment is rooted in the rights-based approach, ensuring that human rights impacts are systematically assessed and addressed alongside business-related risks. Gunnebo leverages both internal and external resources to support this continuous DD process.

7 Implementation of appropriate measures to address human rights risks

7.1 Responsibility for implementation

Responsibility for the implementation of our human rights commitments, as set out in this Policy, is taken at both strategic and operational levels. The Board of Directors, which is responsible for the overall strategic direction of

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Gunnebo, ultimately decides on the Gunnebo’s approach to and processes for respecting human rights, including the allocation of resources to support the implementation of this Policy.

Operationally, the Board of Directors has assigned responsibility for the implementation of this Policy to the Chief Human Resources Officer at Gunnebo Group supported by all relevant departments. Chief Human Resources Officer together with the Human Rights Committee comprised of relevant members of our Executive Board works cross-functionally through forums and working groups. The Human Rights Committee is responsible for overseeing and directing Gunnebo’s human rights work.

Chief Human Resources Officer is accountable for coordinating the annual planning of Gunnebo’s human rights work and the implementation of such plans together with the rest of the organization. The planning and prioritization of human rights activities follows a risk-based approach considering country/region risk levels, risks specific to parts of Gunnebo Group’s value chain, and potential concerns brought to our attention by internal and external stakeholders.

7.2 Implementation of appropriate measures

Gunnebo will ensure that during the implementation and when certain measures are taken the following is done:

- clarifying or assigning responsibility for addressing certain human rights issues at the appropriate level and function within the business;
- update company policies and procedures to address its identified human rights risks;
- conducting training and other capacity building activities; and
- acquiring and/or exercising oversight and leverage with suppliers and other business partners to address identified human rights risks

Gunnebo will be also required to take the following actions, as appropriate:

- develop and implement prevention and corrective action plans for complex issues;
- obtain contractual assurances from direct business partners, including cascading requirements;
- make necessary financial or non-financial investments, such as upgrading infrastructures;
- provide support, including financial support to ensure compliance without jeopardizing their viability, to SME business partners, considering their resources, knowledge, and constraints;
- adapt business plans, strategies, and operations, including purchasing, design, and distribution practices; and
- collaborate with other entities to resolve issues and increase leverage over business partners.

As a measure of “last resort”, when all other actions have failed, and where severe impacts are at stake and only where these impacts outweigh the foreseeable negative consequences of disengagement, Gunnebo will suspend or terminate a business relationship.

Gunnebo will integrate the human rights assessment’s findings across relevant internal functions and processes in order to ensure that potential adverse human rights impacts are effectively prevented and

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mitigated, and that actual impacts are remediated, as appropriate. Gunnebo considers and addresses any inconsistencies between this Policy and other operational policies, procedures and guidance.

8 Implementing and training

Group Human Resources are responsible for Human Rights Policy and are providing continuous training and support to all employees of Gunnebo. Based on our ambition, we will continue to update our Policies and develop guidelines.

Each employee, manager, executive officer, and member of the Board of directors must understand and comply with this Human Rights Policy. Managers should ensure that their teams fully understand and are expected to comply with the standards and requirements stipulated in the Human Rights Policy.

If you have any questions about the content of this Human Rights Policy, or how it should influence your everyday work or a specific matter, please reach out to your local Human Resources representative.

All latest policies and guidelines are available on [Midas](#) at any time to all our employees.

9 Reporting concerns

If you have any concerns, please contact General Legal Counsel or Chief Human Resources Officer.

We encourage everyone to use our [Ethics Helpline](#) to report any wrongdoing. You are expected to report in good faith. For more information, please read our Whistleblowing Policy, available here [Group Whistleblowing Policy.pdf](#).

Gunnebo Group shall handle all reports made to us promptly, at the end of every investigation we will communicate our findings. Gunnebo Group does not tolerate any forms of retaliation against anyone who in good faith submits a report of an alleged violation.

Gunnebo does not tolerate any illegal or unethical behavior. Violation of this Human Rights Policy is likely to damage Gunnebo's brand and reputation. Failure to follow this Human Rights Policy is taken seriously and may result in disciplinary actions appropriate to the violation, including but not limited to, termination of the employment.