# **Policy Human Rights**

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### Introduction

Respect for human rights is crucial for us to be able to conduct our business in a sustainable way. Our approach to human rights is based on the UN Guiding Principles on Business and Human Rights, (UNGPs) which states that it is the duty of governments to defend human rights and it is the responsibility of companies to respect those rights.

## Extent of policy

NilsonGroup AB's human rights policy applies to NilsonGroup AB's entire business operations.

The policy also covers cooperation with partners with whom business relationships arise and applies throughout the value chain. Furthermore, it includes cooperations with the internal as well as external stakeholders NilsonGroup AB has the opportunity to influence.

In addition to the UN Guiding Principles (UNGPs) on Business and Human Rights, our policy is based on:

The Universal Declaration of Human Rights (UDHR) alongside,
The International Covenant on Civil and Political Rights (ICCPR)
International Covenant on Economic, Social and Cultural Rights (ICESCR)
ILO Declaration on Fundamental Principles and Rights at Work
UN Guiding Principles on Business and Human Rights (UNGP)
UN Global Compact
Convention on the Rights of the Child
Children's Rights and Business Principles

### Our commitment

We are committed to respect human rights in our supply chain, our operations and in the communities in which we operate.

We shall avoid causing or contributing to negative impacts or violations of human rights through our own operations. We shall prevent negative impacts on human rights that may be linked to our business, for example through business relationships or similar collaboration with an external party.

Through a systematic due diligence process, supporting measures and a clear division of responsibilities, NilsonGroup AB shall ensure that real, potential or perceived negative impacts or violations of human rights are identified. This means within the Group, in its value chain and in relation to the company's stakeholders. We will also ensure that there are processes in place to enable management and redress of identified negative impacts related to our business.

### Prioritized areas

We conduct risk- and impact assessments of our business to identify, prevent and manage risks in or in connection with our business. Based on our impact assessment, we primarily prioritize risks with a major impact on human rights. We see the greatest risk of impact on human rights linked to our production and to our operations in high-risk countries.

Therefore, we focus extensively on human rights in relation to decent working conditions including, but not limited to, issues relating to wages, working hours, discrimination and health and safety at the workplace. We also prioritize the handling of process- and production chemicals at our suppliers.

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We are aware that our work on human rights may need to be adapted to the occasion and situation. Our focus areas may therefore shift in relation to the risk analysis carried out. We may also need to adjust existing processes and systems and in other cases build up completely new systems for follow-up and control.

## Implementation

Our commitment to human rights is reflected in the company's policies and procedures and shall be characterized by clarity and transparency.

In order to integrate human rights into the management of our operations, we conduct human rights impact assessments as part of our risk assessment for new production and sales markets. For our existing production countries, we regularly evaluate risks related to human rights.

To ensure compliance and implementation of this policy, we place particular emphasis on issues relating to key stakeholders and relationships for which our ability to influence and implement is at its greatest.

#### **Employees**

We respect the human rights of all employees within the company and strive to comply with national laws and other applicable regulations within each country in which we operate. All our employees are informed about and expected to follow our ethics policy to ensure compliance with legal requirements and regulations related to our business and surrounding environment.

#### **Suppliers**

We work close with our suppliers and business partners to ensure that human rights are respected throughout the value chain. Beyond our policies, we have established minimum requirements and a code of conduct with a related audit tool, which forms the basis for evaluating and developing parts of our business that risk directly or indirectly affecting human rights.

Actions to address and manage human rights risks and impacts are controlled and implemented through dialogue and collaboration with relevant stakeholders.

## Costumers

We respect the rights of our customers in all our countries of operation, including the right to privacy. It is our goal to comply with all applicable laws and regulations for personal data protection, such as the Data Protection Regulation. (GDPR)

Our work to manage risks and opportunities as well as our impact on society, positive as well as negative, is communicated annually in our Sustainability Report.

This policy has been adopted by NilsonGroup AB's management team and is a complement to NilsonGroup AB's Code of Conduct, with related documents. For questions regarding the policy and its content, please contact <a href="mailto:csr@nilsongroup.com">csr@nilsongroup.com</a>.

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