

2100 Human rights policy

09.12.2025

Approved by the Axactor Board

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1. Purpose

Axactor's purpose is to help people and companies to a better future. This commits Axactor to the highest standards of business and ethical behavior, including compliance with all applicable laws, regulations, and the company's policies and procedures.

Axactor conducts its business consistent with all internationally recognized human rights, including:

- The International Bill of Human Rights
- The United Nations (UN) Guiding Principles on Business and Human Rights
- The ten principles of the UN Global Compact
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The United Nations (UN) Sustainable Development Goals

The purpose behind this policy is to set out Axactor's commitments to human rights, as they follow from the various policies and Code of Conduct. Axactor shall avoid infringement of human rights of others and take appropriate measures to limit potential adverse impacts. Particular attention shall be paid to Axactor's potential impacts towards vulnerable groups. In the event that Axactor causes or contributes to the infringement of anyone's human rights, appropriate remediation shall be ensured.

The progress on the company's efforts, and results of the due diligence assessments will be communicated annually through the sustainability report.

2. Target group

This policy, related procedures and supporting documents applies to all Directors of the Board, employees, including temporary employees, legal entities within the Axactor Group and where applicable to consultants and subcontractors, pursuant to the Axactor corporate governance policy.

The contents and commitments stated in this policy also applies to Axactor's suppliers and partners, through their signing of Axactor's Supplier Code of Conduct or by written confirmation of compliance with the principles stated herein.

3. Commitments

Axactor is committed to:

- Treat everyone working at Axactor and impacted by our operations with fairness, respect, and dignity
- Create a working environment free from any form of discrimination based on gender, race, ethnicity, sexual orientation, political beliefs, age, etc. (in hiring and employment)
- Respecting the human rights of anyone affected by its operations, including but not limited to, their freedom of opinion and expression, belief, privacy, and equality
- Ensuring the employee's freedom of association and the right to collective bargaining
- Provide a safe, healthy, and secure workplace
- Oppose any form of forced-, compulsory- or child labour
- Providing appropriate grievance mechanisms for potential human rights infringements
- Conduct human rights due diligence assessments and report on the results at least annually
- Aim to continuously improve our human rights efforts
- Ensure appropriate remediation in case of infringements

4. Reporting

Axactor employees, suppliers or others that suspects or becomes aware of any human rights violations in connection with Axactor's operations, shall report it immediately to their manager, human resources, legal and compliance or through the independent whistleblower solution, in accordance with the company's whistleblower procedure.

Review log

Version	Date	Edited by	Comment
1.0	17.08.2022	Chief of Staff	Policy created
2.0	15.12.2022	Chief of Staff	Annual Board approval
3.0	14.12.2023	Chief of Staff	No changes
3.1	12.12.2024	Chief of Staff	Minor changes to language
3.2	09.12.2025	Chief of Staff	No changes