

ALIARO Human rights policy

The ALIARO Human Rights Policy applies to all ALIARO employees and employees of subsidiaries and joint ventures where ALIARO has a controlling interest. It also applies, as far as is reasonably achievable, to our upstream and downstream supply chain through partners, suppliers and third party contractors.

In joint ventures where ALIARO does not have overall control, the leaders and managers of those businesses are strongly encouraged to adopt the same or similar standards. If any human rights issues arise in joint ventures we will work actively with the business leaders to address them.

We seek to address adverse human rights impacts with which the ALIARO Group is involved.

ALIARO is a member of **UN Global Compact Act** (<https://www.unglobalcompact.org>) work to strengthen our human rights work in line with the additional following international frameworks:

- The Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights; and
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Intent

ALIARO's goal is to support, respect and protect human rights—both in our own business activities and in our business relationships with other parties. ALIARO expects the same of its suppliers. This policy, combined with those referenced below that address human rights within their respective scopes, reflects our commitment to human rights and ongoing efforts to protect human rights through our operations.

Child Labor

ALIARO is committed to the abolition of child labor within its sphere of influence. To that end, ALIARO, its employees, and its suppliers must prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

Forced/bonded labour

We have zero tolerance for modern slavery, forced labour and human trafficking, and will ensure our operations are free from these practices. We will work with our business partners and suppliers to influence the elimination of modern slavery, forced labour and human trafficking. We are proactively and progressively engaging with our supply chain on each of these issues. Our approach is in keeping with ALIARO's Code of Conduct and aligned with the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact.

Fair wages/compensation

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. Our business partners must pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. If the compensation paid does not meet the workers' basic needs and provide some discretionary income, our business partners are required to take appropriate actions that seek to progressively realize a level of compensation that does.

Freedom of Association and Collective Bargaining

ALIARO, its employees, and its suppliers must ensure that the rights of eligible employees to choose whether to be a member of a trade union and to bargain collectively as permitted by the Act are not unlawfully interfered with or restricted.

ALIARO must pursue constructive relationships and bargain in good faith with labor unions that represent employees.

Anti-Discrimination and Harassment

ALIARO is committed to a work environment free from discrimination, harassment, and retaliation, and to providing equal employment opportunities to all applicants and employees regardless of race, color, religion, gender, age, national origin, ethnicity, marital status, sexual orientation, gender identity or expression, disability, or military status

ALIARO, its employees, and its suppliers strive to:

- Provide equal employment opportunities to all applicants and employees.
- Maintain workplaces free from harassment or discrimination toward employees, applicants for employment, customers, or any other individuals who visit or conduct business with ALIARO or its suppliers.
- Provide reasonable accommodations to a qualified employee or applicant with a disability, to a pregnant employee or applicant, or to an employee or applicant for their sincerely held religious beliefs or practices, where the reasonable accommodation would enable the employee or applicant to perform the essential functions of their job or to have an equal opportunity to be considered for a job.

Diversity, Equity and Inclusion

At ALIARO, diversity, equity, and inclusion are fundamental values. Our commitment to human rights is reinforced by our diversity, equity, and inclusion practices because a diverse, equitable and inclusive culture values human rights and empowers our employees to protect human rights and report concerns.

ALIARO endeavors to reflect the diversity of the communities we serve and to cultivate a workplace that provides each employee with respect and the opportunity to grow and contribute at their greatest potential. Through our diverse business empowerment initiatives, ALIARO is focused on supporting and expanding equitable opportunities for minority-, women-, disabled-, veteran/service-disabled veteran-, and LGBTQ-owned business enterprises. Employees shall be free to form and join, or not to join, trade unions and to bargain collectively. No employee shall be discriminated on grounds of their gender, marital or parental status, ethnic or national origin, sexual orientation, religious belief, political affiliation, age, or disability.

Safe and Healthy Workplace

At ALIARO, dedication to health and safety is a fundamental value; our efforts to ensure a healthy and safe workplace reinforce our commitment to human rights. ALIARO, its employees, and its suppliers strive to:

- Operate all aspects of business in a manner that protects the safety and health of employees, contractors, customers, and the general public.
- Provide and use the resources needed to maintain safe and healthy workplaces.
- Identify and take reasonable measures to eliminate or mitigate potential workplace hazards.
- Provide safety information to all employees to educate, train, and protect them from workplace safety hazards.
- Ensure all employees are trained and empowered to stop work anytime that unsafe conditions or behaviors are observed until the job can be completed safely.
- Take action to prevent acts of violence, threats, and physical intimidation in the workplace

Working conditions, including hours

We will treat all employees fairly and honestly regardless of where they work. All staff will have a written contract of employment, with agreed terms and conditions, including notice periods on both sides. All staff are entitled to reasonable rest breaks, access to toilets, rest facilities and portable water at their place of work, and holiday leave in accordance with the legislation of the country where they work. All employees are provided with appropriate job skills training.

Security

That the task of guaranteeing the security of our employees, assets, and facilities is developed with efficiency but also with total compliance with the law and with respect to human right.

Land, Forest and Water Rights and Forced Eviction

Our approach is in keeping with ALIARO's Code of Conduct and aligned with the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact

Use of private or public security forces

ALIARO do not apply private or public forces to protect our employees as it is not requested or needed where we are established. All employees are protected by the laws and regulations in each country.

ALIARO Human Rights Management

ALIARO’s social and Human Rights management rely on the commitment to respect all Human Rights. This commitment includes e.g. carrying out social and Human Rights due diligence, engaging with stakeholders and reporting on ALIARO’s social and Human Rights development and performance.

Commitment to respect all Human Rights

ALIARO is committed to the UN Guiding Principles on Business and Human Rights, the Children’s Rights and Business Principles, the OECD Guidelines for Multinational Enterprises and the Equator Principles. In its financing, Investment, supply chain processes and its own operations, ALIARO will seek to respect human rights. In other words, ALIARO has the ambition to avoid causing or contributing to adverse Human Rights impacts through its own activities. ALIARO will also seek to prevent or mitigate adverse social and Human Rights impacts that are directly linked to its operations, products or services by its business relationships. If ALIARO causes or contributes to adverse Human Rights impacts, ALIARO will take the necessary steps to cease or prevent the impacts or ALIARO’s contribution to them.

Due diligence to identify, prevent and mitigate adverse impact

In order to identify, prevent and mitigate adverse social and Human Rights impacts, ALIARO carries out social and Human Rights due diligence of its and Portfolio Companies. ALIARO will screen for actual and potential adverse social

Stakeholder engagement, monitoring and reporting

ALIARO acknowledges the benefits of having an open dialogue with stakeholders to learn and draw on external expertise on issues and challenges of mutual interest and concern. Consequently, ALIARO will engage with stakeholders on Human Rights issues and, when relevant, incorporate the stakeholders’ feedback in relevant processes and Human Rights impacts and will address findings according to the measures in this policy

ALIARO will communicate and report on its social and Human Rights development and performance in its Annual and Sustainability Report-

Due Diligence process

ALIARO’s Human Rights due diligence process takes a risk-based approach and is carried out in the below 3 steps to identify, assess and address actual or potential material adverse social and Human Rights impacts.

<p>Identify - Screen to identify adverse impact</p>	<ul style="list-style-type: none"> • Screening against specific expectations in Human Rights risk sectors • Screening against certain markets/geographies • Controversy screening against ALIARO’s position statements
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<p>Assess - Assess the findings in the screening</p>	<ul style="list-style-type: none"> • Reach an opinion on the risk of an actual or potential adverse social and Human Rights impact
<p>Address (cease, prevent or mitigate) - Act on the assessment</p>	<ul style="list-style-type: none"> • Set expectations on Client or Portfolio Company

Identifying adverse Human Rights impacts (screening)

The purpose of the screening is to identify risk for potential or actual adverse Human Rights impacts. This is done through a combination of screening against policies and processes in risk sectors, general controversy screening and transaction specific screening for transactions involving high Human Rights risk countries.

Transparency and Governance

ALIARO seeks to identify, manage, and prevent violations of this policy. Anyone can report a human rights concern through the options listed below:

- Management
- Leadership
- Human Resources
- Team leader
- Internal Audit
- The ALIARO Operations Team

ALIARO must take any report concerning human rights seriously, no matter how the report is received. Our procedures are designed to promptly review and resolve each issue, as well as routinely monitor and report as necessary.

Should we identify adverse human rights impacts resulting from our business activities, ALIARO is committed to the mitigation or fair and equitable remediation of those adverse impacts. ALIARO must also seek to promote access to remediation where we are linked to those adverse impacts through our relationships with third parties.

Effective human rights practices are contingent on employee awareness and execution. ALIARO must conduct trainings and issue communications to build awareness of our values and business practices. ALIARO employees are required on an annual basis to review and commit to following ALIARO's Code of Business Conduct.

Möln dal. 2023-02-14



Mikael Bedemo, CEO