

Alcohol and Drug Use Policy

The company is responsible for providing a workplace that is safe, hygienic, and conducive to efficient work. The company recognizes that the consumption of alcohol, drugs, or other controlled substances by employees can impair their work performance and significantly impact the safety, efficiency, and productivity of other employees and the company as a whole. The use of legal drugs for improper purposes or the use, possession, distribution, or sale of illegal drugs or controlled substances without a prescription in the company's business or premises is strictly prohibited. Although this policy specifically addresses alcohol and drug use, it also applies to any other substances that are abused for addiction purposes.

The company considers addiction to alcohol or drugs as a condition that can be treated. Employees who suspect they have an addiction to alcohol or drugs are encouraged to seek medical consultation and appropriate treatment immediately before it affects their work performance. Employees responsible for health-related consultations in the workplace are also available to support those seeking help. Employees who request assistance from the company to overcome their addiction or who participate in rehabilitation programs will not be dismissed due to such requests.

The company may conduct regular or random physical examinations if an employee falls into the following categories: those who have issues related to substance abuse, those working in positions that the company's management deems necessary for such checks, or when legally required.

Contractors, transporters, and suppliers who provide goods or services to the company are also required to comply with the inspection policies outlined in this policy. Those who violate this policy will be removed from the company's premises and may be prohibited from entering the company's premises in the future.

This policy must be disseminated in written form, communicated to all stakeholders, and consistently implemented within the organization.

Date of Announcement: on January 4th, 2024


Mr. JAN TORSTEN MICHAEL LINDBLAD

(Managing Director)

Anti-Bribery and Corruption Policy

นโยบายการต่อต้านการทุจริตและคอร์รัปชัน

PRECIOUS PRODUCTS JEWELRY CO.,LTD., is fully committed to prohibit and combat all forms of bribery, facilitation payment, inappropriate gift as well as activities relating to money laundering, terrorism financing and other financial offences.

บริษัทพรีเมียมส์ โปรดักส์ จิวเวลรี่ จำกัด มีความมุ่งมั่นอย่างเต็มที่ในการต่อต้านการติดสินบนทุกรูปแบบ การจ่ายเงินเพื่ออำนวยความสะดวก ของขวัญที่ไม่เหมาะสม ตลอดจนกิจกรรมที่เกี่ยวข้องกับการฟอกเงิน การสนับสนุนทางการเงินแก่การก่อการร้าย และความผิดทางการเงินอื่นๆ

The company has identified the applicable national and international legislations/ regulations relating to bribery, facilitation payment, money laundering, terrorism financing and other financial offences, which must be complied with.

บริษัทได้มีการชี้แจงกฎหมาย ข้อบังคับในประเทศ และระหว่างประเทศที่เกี่ยวข้องกับการติดสินบน การจ่ายเงินเพื่ออำนวยความสะดวก การฟอกเงิน การสนับสนุนทางการเงินแก่การก่อการร้าย และความผิดทางการเงินอื่น ๆ ซึ่งจะต้องปฏิบัติตาม

It is endeavored that the requirements of the Anti-Bribery & AML/CFT Program will be communicated and made available to all concerned employees to ensure a consistent and comprehensive approach throughout the company.

ความพยายามอย่างยิ่งที่จะปฏิบัติตามข้อกำหนดของการต่อต้านการติดสินบน การฟอกเงิน และมีการดำเนินการสื่อสารและเผยแพร่แก่พนักงานที่เกี่ยวข้องทุกคนรับทราบ เพื่อให้มั่นใจว่ามีการปฏิบัติตามแนวทางที่สอดคล้องและครอบคลุมทั่วทั้งองค์กร

To review and assess the adequacy of and level of compliance with the entity's Anti Bribery, Anti Money Laundering and Combating Financing of Terrorism Program, a quarterly internal audit is conducted.

เพื่อทบทวนและประเมินตนเองสำหรับการปฏิบัติตามโปรแกรมการต่อต้านการติดสินบน การต่อต้านการฟอกเงิน และการต่อต้านการสนับสนุนทางการเงินแก่การก่อการร้ายของกิจการ บริษัทได้มีการตรวจสอบภายในประจำปีอย่างสม่ำเสมอ

Management will extend full support to employees not participating in bribery and facilitation payments. Employees raising the concern over bribery and facilitation payment will not suffer demotion, penalty or other consequence for voicing the concern.

สนับสนุนอย่างเต็มที่แก่พนักงานที่ต่อต้านการให้สินบนและการอำนวยความสะดวก โดยพนักงานที่แจ้งเบาะแส เรื่องการติดสินบนและการจ่ายเงินค่าอำนวยความสะดวกจะไม่ได้รับผลกระทบใดๆ หรือบทลงโทษหรือผลกระทบอื่นๆ สำหรับการแจ้งข้อเบาะแส

This policy shall be available as documented information, communicated to all interested parties and consistently applied within the organization.

นโยบายนี้เผยแพร่เป็นเอกสารข้อมูล สื่อสารไปยังผู้มีส่วนได้เสียทั้งหมด และนำไปใช้ภายในองค์กรอย่างสม่ำเสมอ

Announced on January 4th, 2024



Mr. JAN TORSTEN MICHAEL LINDBLAD

(Managing Director)

Subject: Appointment of the Representative for KYC and OECD Compliance

In line with **PRECIOUS PRODUCTS JEWELRY CO.,LTD.**, commitment to developing and implementing the **Responsible Jewellery Council (RJC)** standards, the company seeks to enhance its management systems to align with international requirements and ensure the highest levels of operational efficiency and compliance.

To facilitate this effort and ensure effective implementation, **Ms.Mataporn Thuntanananchai (Manager)** is hereby appointed as the **Representative for KYC (Know Your Counterparty) and OECD (Organization for Economic Co-operation and Development) Compliance.**

The primary responsibilities of the appointed representative are as follows:

1. **Coordination and Communication:**
 - a. Serve as the central point of contact for all departments to oversee and ensure effective implementation of KYC and OECD processes.
 - b. Communicate and coordinate with external parties, including suppliers and stakeholders, to ensure compliance.
2. **Planning and Monitoring:**
 - c. Develop, implement, and update annual action plans related to KYC and OECD compliance.
 - d. Monitor progress and ensure timely execution of the compliance processes, including risk assessments and due diligence activities.
3. **Training and Awareness:**
 - e. Organize training sessions and awareness programs for employees to ensure understanding and adherence to KYC and OECD requirements.
 - f. Provide guidance and support to relevant personnel on compliance matters.

4. **Documentation and Reporting:**
 - g. Maintain proper records and documentation of all activities related to KYC and OECD compliance.
 - h. Prepare regular reports for management and relevant authorities, detailing the company's compliance status and improvement plans.
5. **Audit and Review:**
 - i. Conduct internal reviews and audits to identify potential gaps in KYC and OECD compliance and recommend corrective actions.
 - j. Collaborate with external auditors or consultants during compliance assessments or certification processes.
6. **Risk Management:**
 - k. Identify, assess, and mitigate risks associated with the company's supply chain in alignment with KYC and OECD guidelines.
 - l. Ensure suppliers meet the company's standards for ethical and responsible practices.
7. **Stakeholder Engagement:**
 - m. Actively engage with stakeholders to foster trust and transparency in the company's KYC and OECD-related initiatives.

This appointment takes effect immediately and shall remain valid until further notice. The appointed representative is expected to perform their duties with the utmost diligence, ensuring that PRECIOUS PRODUCTS JEWELRY CO.,LTD., remains compliant with all applicable regulations and upholds its ethical and professional standards.

Issued on: January 4th, 2024



MR.JAN TORSTEN MICHAEL LINDBLAD
(Managing Director)

Child Labor Prevention Policy

PRECIOUS PRODUCTS JEWELRY CO.,LTD., will not employ or support the employment of child labor (under 15 years of age) or employ children below the minimum age required by local law.

The use of child labor deprives children of their childhood, potential, and dignity, and is harmful to their physical and mental development.

If child labor is discovered, the company will take all necessary actions to ensure the best interests of the child by stopping the child from working and providing alternative opportunities that allow the child to grow and develop appropriately. The following steps will be taken:

Procedure if Child Labor is Found in the Company

1. If child labor is found within the company, the child must immediately cease working.
2. The Human Resources Department will inform the child's guardian and explain to both the child and the guardian the reasons why the child cannot continue working. The department will also inquire about the reasons and necessity that led the child to work.
3. The company will offer educational and career alternatives to the child and their guardian, considering the best interests of the child, so that the child can grow and develop appropriately.
 - a. If the child wishes to continue their education, the company will assist in finding a nearby school, a non-formal education program, or other educational opportunities that the child is interested in, ensuring that the child completes compulsory education.
 - b. If the child does not wish to continue their education, perhaps due to personal reasons or financial constraints that prevent the family from supporting their education, the company will coordinate with government agencies, such as the Provincial Social Development and Human Security Office and the Office of Labor Protection and Welfare, to ensure the child receives appropriate help and care.
4. The company will monitor the child to ensure they do not engage in illegal activities or behaviors harmful to themselves or others.
5. A record of the child's history will be maintained to track their living conditions after they have stopped working for the company, ensuring they remain in a safe, healthy, and hygienic environment.
6. The company has implemented child labor prevention measures, placing importance on the recruitment process, which requires age verification of job applicants by checking application documents and viewing original government-issued documents, such as an ID card, to prevent document forgery.
7. The company has communicated this child labor prevention policy to its suppliers and requires suppliers to notify the company if child labor is used within their operations, so that a solution can be jointly sought, ensuring the best interests of the child.

This policy must be disseminated in written form and communicated to all stakeholders and consistently applied within the organization.

Date of Announcement : on January 4th, 2024


Mr. JAN TORSTEN MICHAEL LINDBLAD

(Managing Director)

PRECIOUS PRODUCTS JEWELRY CO., LTD. Code of Conduct

PRECIOUS PRODUCTS JEWELRY CO., LTD., located at 31/4 Moo 4, Khok Krabue, Muang District, Samut Sakhon 74000, Thailand, is committed to adhering to **Corporate Social Responsibility (CSR)** principles, **Responsible Jewellery Council (RJC) Standards**, and client requirements. We recognize the importance of sustainability, providing benefits, supporting communities, and conserving the environment. Our goal is to foster a culture of social and organizational responsibility that benefits the community through collaboration with stakeholders, including employees, business partners, communities, and government agencies.

Human and Labour Rights

We are dedicated to upholding human rights in our operations and business relationships in accordance with the **UN Guiding Principles on Business and Human Rights**, **International Labour Organization (ILO) conventions**, and **RJC Code of Practices (COP)** requirements. Our key commitments include:

- Prohibiting all forms of violence and harassment in the workplace, including corporal punishment, harsh or degrading treatment, sexual or physical harassment, verbal abuse, coercion, and intimidation. Harassment, whether direct or indirect, is strictly unacceptable.
- Never engaging in or supporting child labor (including the worst forms of child labor) as defined by ILO Conventions 138 and 182.
- Never engaging in or supporting forced labor as defined by ILO Convention 29, including bonded labor, human trafficking, and deceptive recruitment.
- Prohibiting all forms of discrimination based on race, ethnicity, caste, national origin, religion, disability, gender, sexual orientation, political affiliation, marital or pregnancy status, or any other characteristic unrelated to job requirements.
- Upholding the right to freedom of association in compliance with local laws, international standards, and RJC requirements.
- Ensuring regular working hours do not exceed 48 hours per week, with a total maximum of 60 hours per week as per local law. Employees are entitled to one day off after six consecutive working days.
- Providing fair wages and benefits in compliance with local laws.
- Promoting human rights through interactions with business partners and stakeholders.

Bribery and Corruption

We strictly prohibit bribery and corruption in all business practices and transactions. Bribery is defined as offering, giving, or receiving any undue advantage to or from:

- Public or government officials,
- Political candidates, parties, or officials, or
- Private sector employees, directors, or agents.

Anti-Money Laundering and Financing of Terrorism

As part of our compliance with **RJC Standards** and industry best practices, we are committed to preventing money laundering and the financing of terrorism. To achieve this, we have implemented **Anti-Money Laundering (AML)** and **Know Your Counterparty (KYC)** procedures, which include:

- Verifying the identity of all counterparties.
- Ensuring counterparties and beneficial owners are not listed on government databases for money laundering, fraud, or prohibited activities.
- Understanding the nature and legitimacy of counterparties' businesses.
- Monitoring transactions for unusual or suspicious activity.

Occupational Health & Safety Management

We comply with all relevant health and safety laws and provide a safe working environment. We prioritize education and awareness about health and safety for employees and on-site contractors. Our **Occupational Health & Safety practices** align with **RJC Code of Practices** requirements to ensure continuous improvement and legal compliance.

Environmental and Energy Management

We are committed to reducing and managing the environmental impacts of our operations by:

- Managing waste and emissions responsibly.
- Promoting the efficient use of natural resources.
- Complying with environmental laws, including waste disposal and wastewater management.
- Adopting the principles of **Reduce, Reuse, and Recycle (3R)** to benefit the environment, communities, and employees.
- Ensuring compliance with **RJC Standards** for environmental impact management.

Product Disclosure

We are committed to transparency in disclosing information about the physical characteristics of jewelry products and materials in line with **Corporate Social Responsibility, RJC Standards**, and client requirements. We aim to build strong relationships with suppliers and business partners to promote responsible practices across our supply chain. To achieve this, we conduct due diligence on all suppliers in alignment with the **UN Guiding Principles on Business and Human Rights** and **RJC Code of Practices**.

This policy is documented, communicated to all interested parties, and consistently applied throughout the organization. **Compliance with RJC Standards is monitored and reviewed regularly to ensure adherence to industry-leading ethical and sustainability practices.**

Announced on January 4th, 2024



Mr.JAN TORSTEN MICHAEL LINDBLAD

(Managing Director)

Conflict of mineral Policy

PRECIOUS PRODUCTS JEWELRY CO., LTD., is recognized as one of the world's major jewelry and gems center, our company emphasize on creating value and success with our customers through Costume jewelry and accessories' development and production. This policy confirms our commitment is committed to corporate responsibility and to respecting human rights in its own operations and in its supply chain. **PRECIOUS PRODUCTS JEWELRY CO., LTD.**, is committed to complying with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas. As part of that commitment.

- Commit to do not use any materials that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo and surrounding countries;
- Commit to do not use any materials that directly or indirectly finance or benefit armed groups in Russia;
- Work with their own upstream suppliers and supply chain to determine the source and chain of custody of any products containing conflict minerals supplied to **PRECIOUS PRODUCTS JEWELRY CO., LTD.**,
- Establish their own procedure, due diligence frameworks and management systems for the traceability of conflict minerals consistent with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas, and communicate an expectation to their suppliers that they do the same; and
- Cooperate with supplychain in its efforts to comply with any applicable reporting requirements of governmental agencies.

This policy shall be available as documented information, communicated to all interested parties and consistently applied within the organization.

Announced on January 4th, 2024



Mr. JAN TORSTEN MICHAEL LINDBLAD

(Managing Director)

Environmental Protection and Sustainable Energy Policy

PRECIOUS PRODUCTS JEWELRY CO.,LTD., is committed to efficient energy utilization, optimal resource management, and environmental protection by minimizing energy losses, conserving resources, and reducing environmental impacts. This commitment forms a core part of the company's operations, promoting environmental responsibility and sustainable development. To this end, the company announces the following Environmental Protection and Sustainable Energy Policy as a guideline for collective implementation:

Energy Conservation

1. Compliance with Laws and Standards:

The company is committed to ensuring full compliance with all applicable laws, customer requirements, and regulations related to energy conservation, environmental protection, and effective energy management.

2. Utilization of Technology and Resources:

The company seeks to identify and implement efficient production technologies, renewable energy sources, and effective energy use. This includes adopting globally accepted best practices under the 4Rs framework:

a) **Reduce**, b) **Reuse**, c) **Recycle**, and d) **Replacement**, ensuring sustainable energy utilization and environmental stewardship.

3. Resource and Equipment Investment:

Adequate resources will be allocated to develop personnel, design, procure, and acquire machinery, equipment, and services that enhance energy performance and environmental protection. Management and employees at all levels are collectively responsible for these initiatives.

4. Communication and Awareness:

The company will actively communicate, promote, and instill awareness of energy conservation and environmental protection among all stakeholders. This includes encouraging collaboration in reducing energy losses, improving efficiency, minimizing pollution, conserving natural resources, and transitioning to renewable energy sources to achieve sustainable development goals.

5. Setting and Reviewing Objectives:

The company will set, monitor, and periodically review objectives, strategies, plans, and targets for energy management and environmental protection in accordance with international standards. Annual reports on energy and environmental management will be prepared for senior management and disclosed to stakeholders.

Environmental Protection

1. Minimizing Environmental Impact:

The company is committed to reducing waste, emissions, and pollution by managing resources responsibly and efficiently. This includes the implementation of waste reduction and recycling initiatives and adopting cleaner production technologies to minimize environmental harm.

2. Sustainable Resource Management:

Efforts will be made to optimize the use of natural resources, including water and raw materials, while promoting the adoption of sustainable and renewable resources to protect the environment.

3. Biodiversity and Ecosystem Preservation:

The company pledges to protect and conserve biodiversity and ecosystems affected by its operations. This includes ensuring compliance with environmental standards and implementing practices that reduce habitat destruction and promote ecosystem restoration.

4. Engagement and Awareness:

Stakeholders, including employees, contractors, suppliers, and partners, will be engaged in efforts to promote environmental protection and sustainability. Awareness campaigns, training programs, and collaborations will be implemented to foster collective responsibility for the environment.

5. Innovation and Continuous Improvement:

The company will continually explore and invest in innovative solutions to reduce environmental impacts, increase efficiency, and support long-term sustainability goals. This includes adopting green technologies and contributing to industry-wide environmental protection initiatives.

All employees, partners, suppliers, contractors, and visitors are required to strictly adhere to this policy, contributing to the company's commitment to energy conservation and environmental protection.

Announced : on January 4th, 2024

Signed by:



MR. JAN TORSTEN MICHAEL LINDBLAD

(Managing Director)

Grievance Mechanism Policy

PRECIOUS PRODUCTS JEWELRY CO., LTD., has established this grievance procedure to hear concerns about employees, non-employees and all stakeholders who can a complaint or to notify in the event of human right, discrimination, forced labor, Bribery and Corruption, Anti-Money Laundering and Finance of Terrorism, Safety, Environment, Product Disclosure and etc.

PRECIOUS PRODUCTS JEWELRY CO., LTD., is responsible for implementing and reviewing this procedure. Concerns can be raised by interested parties via email or telephone to

Name : Mr. JAN TORSTEN MICHAEL LINDBLAD

Phone : 081-8122160

Email Address : Michael.l@preciousproducts.co.th

On receiving a complaint, we will aim to:

- Get an accurate report of the complaint.
- Explain our complaint procedure.
- Find out how the complainant would like it addressed/ resolved.
- Assess the eligibility of the complaint and, where applicable, decide who should handle it internally. In cases where we are unable to address the complaint internally (e.g. where our company is too far removed from the origin of the issue raised in the complaint), we may redirect it to a more appropriate entity or institution, such as the relevant supplier or industry body.
- Where the issue can be handled internally, seek further information where possible and appropriate.
- Identify any actions we should take including hearing from all parties concerned and monitoring the situation.
- Advise the complainant of our decisions or outcomes.
- Keep records on complaints received and the internal process followed, for at least five years.

Announced on January 4th, 2024



Mr. JAN TORSTEN MICHAEL LINDBLAD

(Managing Director)

PRECIOUS PRODUCTS JEWELRY CO., LTD. Supply Chain Policy

PRECIOUS PRODUCTS JEWELRY CO., LTD. is recognized as a leading jewelry and gems manufacturer centers. Our company emphasizes creating value and success with our customers through the development and production of costume jewelry and accessories. This policy confirms our commitment to respecting human rights, avoiding contributions to the financing of conflict, and complying with all relevant **UN sanctions, resolutions, and laws.**

Commitment to Responsible Practices

As a member of the **Responsible Jewellery Council (RJC)**, PRECIOUS PRODUCTS JEWELRY CO., LTD. commits to proving through independent third-party verification that we:

- a. Respect human rights as per the Universal Declaration of Human Rights and the International Labour Organization (ILO) Fundamental Rights at Work;
- b. Do not engage in or tolerate bribery, corruption, money laundering, or the financing of terrorism;
- c. Support transparency in government payments and ensure rights-compatible security forces in the extractives industry;
- d. Do not provide direct or indirect support to illegal armed groups;
- e. Enable stakeholders to voice concerns about the jewelry supply chain; and
- f. Implement the **OECD 5-Step Framework** as a risk-based due diligence management process for responsible supply chains of minerals from conflict-affected and high-risk areas.

Supply Chain Risk Management

1. Risk Assessment and Supplier Engagement:

- The company shall conduct a regular risk assessment of its supply chain.
- The company will not enter into or continue any business relationship with suppliers involved in:
 - Conflict-affected and high-risk areas;
 - Human rights violations, including torture, forced or compulsory labor, child labor, or sexual violence;
 - War crimes, crimes against humanity, or other serious violations of international humanitarian law.

2. Verification and Monitoring:

- The company will verify counterparty details, including **Know Your Customer (KYC)** procedures, for all suppliers of precious gemstones and metals.
- Risk-based assessments will be performed, with appropriate verification controls and monitoring of commercial activities and transactions.

3. Assignment of Responsibility:

- Senior personnel will be assigned to ensure **Supply Chain Integrity** and compliance with due diligence processes.
- This role will focus on preventing risks of illegal activities or breaches of compliance standards.

4. High-Risk Supplier Management:

- Suppliers identified as high-risk through the company's risk assessment module will be flagged.
- A report on these suppliers will be submitted to senior management for review and decision-making.

Specific Policies for Supply Chain Practices

Regarding Serious Abuses in the Extraction, Transport, or Trade of Gemstones:

We will not tolerate, profit from, or assist in any of the following:

- Torture, cruel, inhuman, or degrading treatment;
- Forced or compulsory labor;
- The worst forms of child labor;
- Human rights violations or abuses;
- War crimes, crimes against humanity, or genocide.

If we identify a reasonable risk that an upstream supplier is involved in such activities, we will immediately cease engagement with them.

Regarding Direct or Indirect Support to Non-State Armed Groups:

We only trade in diamonds and colored gemstones that are fully compliant with the **Kimberley Process Certification Scheme**. We will not tolerate direct or indirect support to non-state armed groups, including:

- Procuring materials from or making payments to such groups;
- Supporting groups that illegally control mine sites, transportation routes, or trading points;
- Allowing taxation, extortion, or illegal transactions related to diamonds or gemstones.

If we identify a reasonable risk that an upstream supplier is involved in such activities, we will immediately cease engagement with them.

Regarding Public or Private Security Forces: We affirm that public and private security forces must operate lawfully to provide security for workers, facilities, and property, while respecting human rights. We will not support any security forces involved in abuses or illegal actions.

Regarding Bribery and Fraudulent Misrepresentation of Origin: We will not offer, promise, give, or demand bribes. We will resist attempts to:

- Conceal or falsify the origin of metals, diamonds, or gemstones;
- Misrepresent taxes, fees, or royalties paid to governments for the extraction, trade, or export of these materials.

Regarding Money Laundering:

We will support efforts to eliminate money laundering and address any reasonable risks associated with the extraction, trade, or handling of metals, diamonds, or gemstones.

Policy Communication and Application

This policy will be documented, communicated to all relevant parties, and consistently applied within the organization.

Date of Announced : on January 4th, 2024

Signed by: 

MR.JAN TORSTEN MICHAEL LINDBLAD

(Managing Director)

Nondiscrimination and Anti-Harassment Policy

Principles

PRECIOUS PRODUCTS JEWELRY CO.,LTD., recognizes that human rights are a fundamental component of a sustainable society and should be protected in all aspects of life. The company is committed to protecting human rights while supporting the strong growth of the organization. Therefore, as part of this commitment, the company aims to create a safe and healthy workplace free from discrimination and harassment.

Objectives

This policy establishes the principles and guidelines that must be followed by all employees and stakeholders of the company and how employees should interact with others. The goal is to foster a strong and sustainable corporate culture that aligns with the objectives set out in the company's human resources policies and strategies, as well as the commitments outlined in the company's sustainability policy and key issues identified in the company's sustainable business framework.

Scope

This policy applies to all employees within the company group, including the board of directors, management, and employees at all levels. Furthermore, the company encourages its business partners, suppliers, contractors, and other stakeholders to adopt this commitment in their activities and operations.

Definitions

- **Discrimination:** The unfair and/or unequal treatment of an individual or group based on gender, gender identity, age, race, ethnicity, nationality, and other characteristics unrelated to ability.
- **Harassment:** Unwanted behavior that causes psychological, emotional, or physical harm to others.

Oversight

This policy has been approved by the company's board of directors, with the Sustainability, Corporate Governance, and Risk Management Committee providing recommendations and considering amendments to the policy. This committee also represents the board of directors in overseeing the implementation of this policy.

Policy

- Ensure a workplace free from discrimination based on gender, gender identity, age, race, ethnicity, religion, nationality, and other characteristics unrelated to ability.
- Ensure a workplace free from all forms of harassment, both gender-related and non-gender-related, whether verbal or otherwise, including physical harassment, online harassment, and/or cyberbullying.
- Ensure fairness and non-discrimination concerning compensation, benefits, working conditions, and opportunities for development and advancement for all employees within the company and its affiliates.

- Ensure that management, operational, and administrative processes are carried out without discrimination.
- Implement measures to prevent discrimination and harassment in the workplace and/or in the company's operations, including clear policies and codes of conduct, training for all employees, clear grievance and/or reporting mechanisms, and regular monitoring of employee well-being.
- Ensure sufficient measures to protect employees' personal data and ensure that such data is used or disclosed lawfully and appropriately.
- Communicate the company's nondiscrimination and anti-harassment policy to all stakeholders, both within and outside the organization, and report the company's performance regarding nondiscrimination/anti-harassment to management, the board of directors, and the public as appropriate.


Investigation and Disciplinary Actions

The company has a zero-tolerance policy for discrimination and harassment, as outlined in this policy. In cases of discrimination and/or harassment within the company's operations or processes, employees can report to their supervisor, the Human Resources Department, or the Internal Audit Department. Whistleblowers are protected under the company's grievance policy in all cases.

All reports will be promptly investigated by an independent team, with the company ensuring measures to protect the privacy and confidentiality of those involved. If discrimination or harassment is confirmed, appropriate disciplinary action will be taken against the offender, which may include a formal written warning, mandatory training on nondiscrimination/anti-harassment, and could extend to termination and/or legal action as appropriate. The company also regularly reviews and updates its policies and procedures to enhance the effectiveness of eliminating discrimination and harassment within the company.

This policy must be disseminated in written form, communicated to all stakeholders, and consistently implemented within the organization.

Date of Announcement : on January 4th, 2024


Mr. JAN TORSTEN MICHAEL LINDBLAD

(Managing Director)