



# **HUMAN RIGHTS POLICY**

*Version 7.0*

## **»» PURPOSE AND SCOPE**

This Human Rights Policy is binding on all employees, subsidiaries in all countries and business activities of the Scan Global Logistics Group.

Our purpose is to make the world a little less complicated while acting responsibly and with integrity. We believe that our purpose can be best fulfilled by bringing a human approach to everyone anywhere by respecting human and labour rights and the equality of all human beings and by promoting good intentions and honesty.

This Human Rights Policy reflects our commitment to respect human and labour rights as described in international legislation and standards, such as UN Global Compact, International Labour Organization "Declaration on Fundamental Principles and Rights at Work, International Bill of Human Rights and principles from the UK Modern Slavery Act as well as conclusions from the materiality assessment conducted. It further covers our activities to promote improvement of environmental, social, societal, and humanitarian performances.

Human and labour rights matters are integrated into our annual materiality assessment, defined by methodologies from Sustainability Accounting Standards Board, Global Reporting Initiative, and Corporate Sustainability Reporting Directive to initiative future mandatory reporting following European Sustainability Reporting Standards.

In the following we include labor and human rights matters such as employee health and safety, working conditions, social dialogue, child labor, forced labor and human trafficking, diversity, discrimination, and harassment, work councils as well as external stakeholder human rights.

## **»» COMMITMENT TO INTERNATIONAL HUMAN RIGHTS STANDARDS**

As a global group, we impact and affect the communities in which we work in various ways, and we are strong believers in always protecting fundamental human and labour rights.

We are committed to leaving a positive impact where human rights are protected and respected. We operate our business following the UN Global Compact's ten principles in which we have been a signatory and active participant since 2015. We are committed to adhering to the principles of the 1998 International Labour Organization "Declaration on Fundamental Principles and Rights at Work" in accordance with national law and practice. We are committed to enforcing and respecting key national and international human rights standards such as the International Bill of Human Rights. These international standards, among many, are key factors in the way we shape our work to ensuring a responsible and ethically irreproachable business conduct. We follow the principles set out in the UK Modern Slavery Act 2015 and take appropriate steps to ensure that modern slavery and human trafficking are not taking place in any part of our supply chain or in any part of our business.

By following these international standards and conventions, we commit and work to ensure the effective abolition of child labour, the elimination of discrimination or harassment of employment and occupation and the freedom of association, along with a strong social dialogue. We further prohibit forced and compulsory labour, all forms of modern slavery, human trafficking, and are dedicated to ensuring a safe and healthy work environment while setting a high standard for working conditions. We believe that by doing so, the highest productivity, creativity and efficiency can be attained.

Our employees are respected, and we do not tolerate any form of discrimination or harassment concerning gender, race, religion, age, disability, sexual orientation, national origin, or any other characteristic protected under law. We acknowledge that some employees may be at greater risk of negative human rights impacts, due to their place of living. We embrace these risks and understand our responsibility to make sure that additional activities are put in place. Further, we acknowledge the importance of dialogue with employees, suppliers and other stakeholders and expect them to build awareness and knowledge on human rights and report any malicious behaviour to foster a strong external stakeholder's human rights focus.

We have set a target of zero cases reported across all over human and labour rights matters. This goal underscores our dedication to eliminating child and forced labour, discrimination, harassment, and to solidifying a healthy and safe working environment. By raising awareness both internally and externally, we empower our organization and partners to work together to ensure a safe working environment throughout our entire value chain.

Our target is to have zero human and labour rights issues or negative impacts to report across our global operation by 2027. In our annual sustainability statement, we disclose the number of reported labour and human rights issues and reaffirm our commitment to addressing any adverse impacts on individuals, workers, and communities caused by our actions. We also pledge to collaborate in providing remedies where we have contributed to human rights violations.

## **»» OUR HUMAN RIGHTS ACTIONS AND MATTERS**

We recognise that climate change is of great threat and will have negative impact on humanity now and for the future. The Scan Global Logistics Group is therefore strongly committed to helping reduce climate change and has set targets aligned with the scenario of limiting global warming to 1.5°C through the Science Based Target initiative. We will reduce climate change by establishing partnerships with stakeholders and developing sustainable transportation solutions for our customers, as well as reducing our own company footprint.

We are also very proud of our collaborations with various UN organisations and NGO's, which the Scan Global Logistics Group has been serving since its incorporation. We help these organisations with Aid & Relief by transporting medical and emergency supplies to countries in need whether from war, natural disasters, man-made disasters, or poverty.

All these activities are done within the realms of the ILO conventions.

We are committed to complying with the local laws in every country where we conduct business. In case of a contradiction between international and local laws, Scan Global Logistics Group will comply with the highest standard. In case of a contradiction between national laws and international standards, we will adhere to national law, while still seeking ways to respect international human rights to the greatest extent possible.

## **»» FORCED LABOR, HUMAN TRAFFICKING, CHILD LABOR AND MODERN SLAVERY**

Modern slavery is one of the most complex and important human rights challenges of our time. Scan Global Logistics Group recognises the importance and seriousness of this challenge and has a zero-tolerance policy against all forms of modern slavery, forced labour, human trafficking, or child labour.

We follow the principles set out in the UK Modern Slavery Act 2015 and take appropriate steps to ensure that modern slavery and human trafficking are not taking place in any part of our supply chain or in any part of our business. Each year, a statement in relation to the provisions set out in the Modern Slavery Act 2015 is published. This statement covers our specific actions, commitments, and risk assessments against modern slavery for the relevant financial year and can be found on our webpage [Policies | Global ESG | Scan Global Logistics](#).

As a global group we understand our responsibility in ensuring the abolition of such crimes against humanity. We further recognise that some of our supply sectors are potentially higher risk due to their place of business. We embrace these risks and understand our obligation to make sure that additional activities are put in place.

As a global organisation we have set a target of zero cases reported on forced labour, human trafficking, child labour and modern slavery by 2030. This target supports our zero-tolerance policy against all forms and to ensure accountability. We will be reporting figures and progress in our Annual Report.

## **»» DIVERSITY, DISCRIMINATION AND HARASSMENT**

All employees, managers, and suppliers are required to recognise and support equal human rights. They must actively oppose any form of discrimination, differential treatment, harassment, or undue interference with work performance. This includes discrimination based on nationality, race, disability, gender, gender identity, gender expression, sexual orientation, religion, political beliefs, or ethnic and social background. Any form of physical, sexual, mental, or verbal abuse, as well as threats of abuse or any other form of intimidation, is strictly forbidden.

We aspire to be a diverse and inclusive organisation. As a people-driven business that is represented across all inhabited continents of the world, we always strive to reflect the

diversity of the world we are present in, the global marketplace we operate in as well as the customers and partners we engage with. We are committed to creating a meaningful workplace for everyone working at SGL. A workplace where everyone feels valued and is given the opportunity to realise their human potential. It is by growing our people, we grow our business.

With our aim to bring a human approach everywhere we operate, we aspire to not only uncomplicate the world of our customers but also the world of our own employees. This entails a constant revision of any people process and system, from recruitment and onboarding to development and progression, to ensure we are supporting the inclusion and diversity of real people. It is our ambition doing so with evident results and progression.

We apply a comprehensive definition of diversity with the ambition to embrace and include all elements in our inclusion efforts. In our view, diversity encompasses any differences in experiences and perspectives as well as social identities such as gender, age, ethnicity, nationality, political and religious beliefs, sexual preference and orientation and cultural backgrounds. As a traditionally male-dominated trade, we are particularly focused on the inclusion of female employees.

We have a target to reduce reported cases of discrimination and harassment to 0 by 2030.

To foster an inclusive and diverse global organization, we have set a diversity target to have minimum 40% of the underrepresented gender across all employee groups by 2027. Furthermore, we commit to a target of 35% female representation across all managerial roles and commit to a target of 25% female representation in senior management positions by 2027.

## **» HEALTH AND SAFETY**

Employees' health, safety and well-being are our top priority. We are committed to protecting everyone – from our own workforce, the workforce in the value chain, business partners, subcontractors, customers, as well as the public. Making safety a part of the day job, every day, 24/7.

Our Health and Safety Policy guides our approach, and responsibility for health and safety lies with the Global Vice President, People, Leadership & Culture, who is supported by the Group Head of Quality. We consider health and safety risks as part of our enterprise risk management approach and have incorporated them into our ERM system. We identify safety hazards for employees, whether they are working in offices or on project sites.

We will comply with ISO 45001. Today, our Swedish organisation and the majority of Industrial Projects are a part of our ISO 45001 certification, and the rest of the world will follow.

Our target is zero severe injuries and fatalities consistently, year on year. Lost Time Incidents



are incidents that have caused at least one workday of absence after the day of the injury. Lost Time Incident Frequency (LTIF) represents Lost Time Injuries reported in the internal system per million working hours. Our target is zero LTIF in 2030 and year on year. In our Annual Report, we will be publishing figures related to health and safety.

## **» FREEDOM OF ASSOCIATION AND SOCIAL DIALOGUE**

We firmly support the right to freedom of association and encourage robust social dialogue as key components of a fair and equitable workplace. By allowing employees to freely form and join unions or other representative organisations, we foster a collaborative environment where diverse voices are heard and respected. Engaging in open, constructive social dialogue with employee representatives helps us address concerns proactively and ensures that our policies and practices are aligned with the needs of our workforce. This commitment strengthens mutual trust, enhances workplace harmony, and drives collaborative growth.

The Meaningfulness Questionnaire ("MQ") is the primary way we assess and monitor our progress in all areas relating to employee experience, well-being, and social dialogue. We have set a target of archiving an MQ score of 80 by 2025. In our Annual Report we will be publishing figures and progress on our MQ score.

## **» WORKING CONDITIONS**

As a responsible employer, we respect the rights to just and favorable working conditions including a living wage or pay in line with industry standards. We comply with the respective national laws and regulations regarding working hours, wages, and benefits.

We are committed to paying fair and adequate wages. All our employees in European countries are paid an adequate wage in line with Directive (EU) 2022/2041, and all our employees in non-European countries are paid an adequate wage in line with applicable national benchmarks. We incorporate national benchmarks when determining wages for all employees, to ensure they receive an adequate wage.

To ensure wage equality, we have conducted an external audit to benchmark and set targets in line with international standards. Leveraging insights from global MQ surveys, we gain a comprehensive understanding of the current state of wage equality within our organisation.

Based on these survey results, we annually develop Global Actions, like a Corrective Action Preventive Action (CAPA) plan, to address any identified disparities. These actions include setting specific objectives, timelines, and assigning responsibilities.

Continuous monitoring and reporting will be established, including the future implementation of a dashboard or regular reporting mechanism, to track progress against our targets and ensure ongoing compliance with our wage equality goals. We will define a clear follow-up based on the Global Actions to ensure effective implementation. We will

review the progress and adjust as necessary.

We aim to reduce the wage gap to less than 5% across all comparable roles by 2027. This target underscores our commitment to ensuring fair and equitable compensation for all employees, irrespective of gender, race, or other characteristics. Through ongoing monitoring, reporting, and targeted actions, we will work diligently to identify and rectify any disparities, fostering a workplace where all employees are valued and rewarded equally for their contributions.

Our employees' welfare is a top priority. We provide extensive social protection measures, such as healthcare, retirement plans, disability insurance, paid leave, and workplace safety, customised to local regulations and market needs, so all our employees are protected following major life events.

## **» WORK COUNCILS**

Our commitment to human rights includes fostering an inclusive workplace through active engagement with Work Councils.

These councils provide a platform for dialogue between employees and management, ensuring that workers' voices are heard and their rights protected. Work Councils advocate for employees' interests, facilitate consultations on working conditions and organisational changes, and offer structured processes for conflict resolution. They also enhance transparency and accountability by involving employees in decision-making processes.

By supporting and collaborating with Work Councils, we ensure that all employees are treated with dignity and respect, safeguarding their rights within the workplace.

## **» CAREER MANAGEMENT & TRAINING**

We are dedicated to fostering a culture of continuous learning and professional growth. To support this, we offer a variety of opportunities for training and development, enabling employees to enhance their skills and advance their careers. Our training programs are designed to meet diverse needs, ranging from technical skills to leadership development.

We provide a range of resources and programs to support ongoing education and skill development. This includes workshops, seminars, online courses, and access to industry conferences. Employees are encouraged to pursue further education and certifications relevant to their roles, with the company often providing financial support.

As part of our commitment to upholding human rights, we provide regular training on human rights issues, company policies, and ethical behaviour. This training ensures that all employees are aware of their rights and responsibilities, understand the importance of maintaining a respectable and inclusive workplace, and are equipped to handle any ethical dilemmas they may encounter.

By investing in career management and training, we aim to create a dynamic and supportive environment where employees can thrive and reach their full potential.

### **» PRIVATE OR PUBLIC SECURITY FORCES**

All security forces engaged by us are obliged to respect all internationally recognised human rights. We will ensure that they receive adequate guidance and training, and their actions will be monitored.

### **» EXTERNAL STAKEHOLDER HUMAN RIGHTS**

We expect all our business partners to adhere to the same ethical principles and standards as our own. We share information and explain our expectations and require every stakeholder whether internal or external comply with our Code of Conduct policy, which further extends our human rights initiatives. Our human rights expectations are also reflected in various other policies such as our Diversity and Inclusion Policy, Environmental Policy, Health and Safety Policy, Quality Policy and Anti-Corruption Policy.

We have implemented a Third Party Code of Conduct, which explicitly states our expectations to suppliers and other partners to commit to respecting human and labour rights.

### **» MANDATORY TRAINING AND COMMUNICATION**

Training in human rights and other Scan Global Logistics Group policies are conducted for all new employees and every two years in the global mandatory e-learning platform 'Academy' together with tests which all employees must pass to finally receive a diploma for the training as documentation. Updates to the policy are communicated to all employees via the mandatory training. All training is registered and stored digitally in the system, and the number of employees trained is reported in our annual sustainability reporting. Besides mandatory training the policy is published publicly on our website, and available for all employees via our Intranet.

We have a target of training 100% of our employees and report the figure annually in our sustainability report. In our annual sustainability reporting we will be publishing figures and progress on our employee training.

### **» GOVERNANCE**

Our Compliance and Legal team supported by our Global General Counsel oversees the policy to monitor our compliance with the human and labor rights standards and conventions and secures the implementation of this policy.

The policy is created using a risk-based approach. Impact and risk are furthermore included in our materiality assessment to guide our human and labour right matters.



This Policy is reviewed and updated annually.

It may be amended at any time with the approval of Global General Counsel.

## **» HOW TO RAISE A CONCERN**

You are encouraged to raise concerns about any issue, violation, or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes a breach of human rights standards and conventions, or if you have any other queries, these must be raised with the Global General Counsel or if you wish to raise your concern anonymously, you may use our Whistleblower System at [Policies | Global ESG | Scan Global Logistics](#) under Whistleblower Policy.

For questions related to the Human Rights policy, please contact our Global General Counsel at [hchr@scangl.com](mailto:hchr@scangl.com).