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Evac Group Policy

Human Rights Policy



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1. Introduction

At Evac, we are committed to respecting the fundamental rights and freedoms of all individuals, as outlined in international human rights standards. We believe that respect for human dignity is central to building a sustainable, inclusive, and ethical organization. This policy applies to all Evac Group business lines, units, locations, and activities worldwide. In addition, we encourage partners in parts of our value chain which are outside of our direct control to apply the same requirements set out in this policy. The expectations set in this policy are further elaborated in our Code of Conduct, our Supplier Code of Conduct, Health and Safety Policy and Diversity and Inclusion Policy.



2. Our commitment

Evac is committed to respecting human rights in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs). We also draw on guidance from the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

Evac is committed to respecting human rights as enshrined in:

- The International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, as well as the International Covenant on Economic, Social and Cultural Rights
- The International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, including the freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labor, the effective abolition of child labor, the elimination of discrimination in respect of employment and occupation, and a safe and healthy working environment.
- The Convention on the Rights of the Child, including its four core principles, and the Children's Rights and Business Principles which Evac is committed to respecting and implementing throughout our business and value chains, including our workplace, marketplace, and communities.

Where there is potential for adverse impacts on vulnerable people or groups, we will also consider other international standards and principles that elaborate on the rights of such individuals or groups.

In addition, Evac is committed to implementing the Ten Principles of the UN Global compact. As part of our commitment to sustainable and responsible business practices, Evac has embedded the Ten Principles of the United Nations Global Compact into strategies and operations, and committed to respecting human and labor rights, safeguarding the environment, and working against corruption in all its forms.

Evac is committed to taking measures, based on due diligence processes, to avoid causing or contributing to adverse human rights impacts throughout our value chain, including impacts on our own personnel, on our customers and clients as well as on workers in our value chain, and to addressing and remediating such impacts when they occur. We find ways to exercise our leverage to address adverse human rights impacts arising out of our business relationships.



3. The human rights topics pivotal to Evac

3.1 Freedom of association and right to collective bargaining

Evac respects the rights of employees to form, join, or not join labor unions. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The company is committed to bargaining with such representatives in good faith.

3.2 Elimination of forced or compulsory labor

Evac will not engage in, or support the use of, modern slavery or forced or compulsory labor in any forms, such as bonded labor, human trafficking, or involuntary servitude. We recognize that modern slavery is a grave violation of human rights and a criminal offense under international law. We recognize that modern slavery is a global phenomenon, and we understand our responsibility to prevent, mitigate, and remediate the risk of modern slavery in our operations and supply chains. We are committed to eliminating modern slavery from our operations and supply chains.

Evac prohibits the use of illegible and illegal work contracts. Evac ensures that all employment is agreed to freely and voluntarily. All Evac employees shall be provided with a written and understandable contract of employment, or similar employment letter, which outlines their terms of employment and respects their legal and contractual rights. Evac shall not rely on part-time, short-term, or casual laborers, interns, trainees, or false apprenticeships for the purpose or intention of paying lower wages.

Evac prohibits the charging of recruitment fees and related costs, as defined by the ILO, irrespective of where or how employees are recruited. Evac acts in accordance with the Employer Pays Principle (EPP), which stipulates that no worker should pay for a job. The costs of recruitment should be borne not by the worker but by the employer.

Workers shall be allowed to move around freely and leave their place of work when their shift ends, including a prohibition on retention of identity documents or work permits. We will not tolerate forced or compulsory labor by our business partners, stakeholders, or supply chain, and take steps to prevent this by auditing our partners.

3.3 Abolition of child labor

Evac prohibits the use of child labor in any form. We recognize that children are entitled to protection, education, and the opportunity to grow and develop in a safe and nurturing environment. We commit to complying with all applicable laws and regulations regarding child labor and will not engage in or support any activities that exploit children.

Furthermore, we will take proactive measures to ensure that our supply chains are free from child labor. We will work collaboratively with our suppliers and partners to implement auditing mechanisms to identify and address any instances of child labor within our supply chain.



3.4 The elimination of discrimination

Evac is committed to equal opportunities and does not tolerate any discrimination in employment based on an individual's protected status. At Evac we want to provide a safe workplace that is free from bullying or harassment. We will not tolerate any form of harassment or bullying of employees by co-workers and expect that all employees treat co-workers, business partners, stakeholders, and all rights-holders with respect.

3.5 Safe and healthy working environment

Evac's operations are conducted in a manner that protects the health and safety of the company's employees, contractors, and visitors. The company complies with all applicable health and safety laws, regulations, as well as internal requirements. We are committed to engaging with our employees to continually improve the health and safety in our workplaces and education around health and safety, including the identification of hazards and remediation of health and safety issues.

3.6 Other work-related rights

All Evac employees have the right to fair working conditions, fair wages, and reasonable working hours in compliance with applicable local laws. Evac employees have the right to stop working if they find conditions, equipment, or tasks that threaten their health or safety, or that of others.

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4. Management, mitigation, and elimination of risks related to human rights

We have a **Health & Safety Policy** in place that outlines our commitment to providing a safe and healthy working environment and complying with relevant laws and regulations. To ensure we can manage, mitigate and eliminate any risks related to health & safety we actively monitor our **lost-time incident frequency** (annual target <3), the **number of safety observations** (250), the **number of safety actions** (250) and the % of our personnel who have completed our **Safety e-learning**.

To ensure fair wages, Evac is committed to completing a **living wage gap assessment** of 100% of its' own operations by the end of 2026.

We recognize that many of our potentially most severe human rights risks and impacts derive from our supply chain. That is why we have a **supplier screening program** in place to ensure that our suppliers share the same high standards as we do. Our Supplier Code of Conduct also gives us contractual assurance to human rights topics which are relevant to us. We regularly engage with our suppliers through supplier questionnaires and audits and are committed to building corrective action programs in case any concerns arise. Our target for 2025 is to have **100% Supplier Code of Conduct coverage** (spend-based), currently by end of 2024 we are at 91%.

We will also train all our employees regarding human rights as part of our Code of Conduct training and the aim is to have **100% of employees trained in human rights during 2025**. In addition, we will be training our procurement and sourcing professionals regarding human rights in our value chain so that we ensure we manage our supply chain risks better.



5. Reporting grievances

Should any Evac employee, supplier, partner, or other stakeholder become aware of any non-compliance with this Human Rights Policy by either an Evac employee or a business partner, they are encouraged to report such behavior through the Evac whistleblowing channel. The channel can be found from the Evac website.

Evac has a Whistleblowing Policy in place, describing how suspected misconducts or unethical behavior can be reported, how the whistleblowing channel is managed, and how the investigation process works. The same reporting system is open for both Evac employees as well as external parties, so anyone can submit their report through the channel. All messages are investigated confidentially. We do not tolerate any form of retaliation against people raising concerns.



6. Way forward

We recognize the need to constantly develop our human rights due diligence processes and practices to be able to manage, mitigate and eliminate the actual and potential adverse impacts deriving from our business operations in our value chain. We will conduct a Human Rights Impact Assessment during 2025 to give us a solid, fact-based foundation to build our due diligence processes on. Additionally, we will continue to increase our Supplier Code of Conduct coverage (spend-based) and the aim is to reach 100% coverage by the end of the year 2025. To deepen our understanding of suppliers' human rights practices, we will roll out supplier questionnaires, starting with our largest suppliers, as a basis for potential engagement and improvement plans.

We understand that respecting human rights requires ongoing effort, vigilance, and collaboration. Therefore, we will train our employees annually on the Code of Conduct, human rights, and modern slavery so that they can be aware of how their work impacts the human rights of people in our operations, value chain, and communities.

We are committed to continuous improvement and will regularly review and update our human rights policies, practices, and procedures to reflect evolving standards and best practices in the field of human rights.



7. Policy implementation, review & approval

The Evac Global Leadership Team, overseen by the Board of Directors, is responsible for the overall strategic direction of the business, and ultimately decides on Evac's approach to and processes for respecting human rights, including the allocation of resources to support the implementation of this policy.

Operationally, Evac's Global Leadership Team has assigned responsibility for the implementation of our Human Rights Policy to both business line management teams as well as group support functions.

On an everyday level, each Evac employee is expected to act according to this Policy and take the needed steps to ensure that the Policy is implemented throughout Evac's business operations, including own operations and supply chain.

The Policy will be regularly updated to allow us to communicate our evolving approach on human rights. The policy will be reviewed as a part of an annual sustainability review or as needed to reflect best practices, industry trends, regulatory changes, organizational needs, or stakeholder input. The reviewing and revising process includes assessing performance, gathering feedback from relevant stakeholders, identifying update needs, revising, getting management approval, and implementing the updated policy.

This Human Rights Policy has been approved by the CEO Björn Ullbro in 2025.

Björn Ullbro, CEO of Evac Group



Revision history

REV. NO.	DESCRIPTION	AUTHOR	APPROVER	YEAR
1	First release	Senja Koivusalo	Björn Ullbro	17.6.2022
2	Modern slavery section added	Senja Koivusalo	Björn Ullbro	30.6.2024
3	Reporting grievances, Way forward, sections and KPIs added	Senja Koivusalo	Björn Ullbro	17.3.2025



Evac is the world's leading provider of integrated water and waste management systems, as well as corrosion-protection systems for the marine, offshore, and building industries. With offices in 14 countries across four continents and representatives in more than 70 countries, we are close to our customers wherever they are. We contribute to a better environment and cleaner seas by helping our customers eliminate waste, conserve water, and mitigate emissions. Our ambitious target is to enable a future with no waste.

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