

Evac Group Oy

Evac Group Human Rights Policy



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1. Introduction

At Evac (“Evac” or the “Company”), we are committed to respecting the fundamental human rights and freedoms of all individuals, as outlined in internationally recognised human rights standards. Respect for human dignity is central to building a sustainable, inclusive, and ethical organisation. This Human Rights Policy (“Policy”) applies to Evac. This policy guides our relationships with employees, third-party contractors, suppliers, business partners, customers, and communities. Our approach is informed by ongoing human rights due diligence, in line with the evolving EU legal framework and international expectations.

2. Our human rights commitment

Human rights are the rights and freedoms that all people have. Evac is committed to respecting human rights in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs). We also draw guidance from the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct.

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 Labour 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 labour, the effective abolition of child labour, 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, and marketplace.
- International Humanitarian laws and conventions (IHL) to protect those people in armed conflict according to the standards of international humanitarian law, aiming to protect people who are not involved in the combat e.g. civilians and restricting certain means and methods of warfare e.g. the use of anti-personnel mines.

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

Where the applicable laws and international human rights standards differ, we strive to follow the higher standards while complying with applicable laws. In cases of direct conflict with laws and international human rights we will adhere to the law whilst seeking ways to respect human rights to the greatest extent possible.

Evac takes steps to prevent or mitigate adverse human rights impacts that are directly linked to the Company through its business relationships. For more information on our approach to suppliers, see our Supplier code of conduct.

3. Our risk assessment processes

3.1. Identifying and assessing actual and potential human rights impacts

We strive to establish and continuously develop human rights risk assessment processes, including when entering new business relationships or when operating conditions change, as such changes may give rise to new actual or potential adverse human rights impacts.

We regularly engage with employees, communities, workers, and other stakeholders to ensure that their perspectives inform our decisions, and we take all appropriate measures to protect stakeholders with whom we engage from violence, intimidation or other acts of retaliation. Where it is not reasonably possible for us to engage effectively with stakeholders, we seek to consult with experts who can provide credible insights into actual or potential adverse impacts. We also make use of information gathered through the notification mechanism and the complaints procedures set out in Section 8.

3.2. Prioritisation

We prioritise our efforts to address human rights risks based on the following:

- Severity: as determined by scope (number of individuals potentially affected), scale (gravity of impact, e.g. loss of life), and irremediability (ease of restoring/remedying prior enjoyment of rights, i.e. the possibility of restoring affected people to their prior state of well-being); and
- Likelihood: the risk of such negative effects actually occurring.

Our human rights priorities are based on our human rights risk assessment efforts; we consider the following human rights risks to be of relevance to our Company as outlined in the 3.3.

3.3. Our human rights priorities

Based on our human rights risk assessment efforts, we consider the following human rights risks to be of particular relevance to our company:

Employment practices

We commit to provide working conditions which respect the human rights of our employees and avoid infringing on the human rights of others. We will seek to address any human rights adversely affected by Evac.

For our employees we commit to offering a safe and fair workplace, with no tolerance to discrimination in employment based on protected status, and a workplace free from bullying or harassment. Access to grievance mechanisms is available to all employees without fear of redress.

We will offer fair working conditions, fair wages and reasonable working hours to our employees. To ensure fair wages, Evac is committed to completing a living wage gap assessment of 100% of its' own

operations by the end of 2027. Evac also respects their rights to collective bargaining and choice to join or not join a recognised union with freely chosen representatives.

Abolition of forced labour

Evac will not engage in, or support the use of, modern slavery or forced or compulsory labour in any forms, such as bonded labour, human trafficking, or involuntary servitude.

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 will not rely on part-time, short-term, or casual labourers, 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 labour by our business partners, stakeholders, or value chain.

Abolition of child labour

Evac prohibits the use of child labour 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 labour and will not engage in or support any activities that exploit children.

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

Health and safety 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.

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.

Environmental impact

Evac is committed to operating responsibly in relation to the environment, in alignment with our environmental management systems and Group Environmental policy. This includes actively working to reduce the negative environmental impacts associated with our operations, protect biodiversity and water resources, and use resources as sustainably as reasonably possible.

4. Implementation of appropriate measures to address human rights risks

4.1. Responsibility for implementation

Responsibility for the implementation of our human rights commitments, as set out in this Policy, is taken at both strategic and operational levels. The board of directors, which is responsible for the overall strategic direction of the Company, ultimately decides on the Company's approach to and processes for respecting human rights, including the allocation of resources to support the implementation of this Policy.

Operationally, the board of directors has assigned responsibility for the implementation of this Policy to Chief Executive Officer, supported in particular by Group Leadership Team, Human Resources, Sustainability, Legal and Purchasing and supplier quality management teams.

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 our own operations and value chain.

4.2. Implementation of appropriate measure

The Company will integrate the human right assessment's findings across relevant internal functions and processes to ensure that potential adverse human rights impacts are identified, effectively prevented and mitigated, and that actual impacts are remediated, as appropriate. The Company considers and addresses any inconsistencies between this Policy and other operational policies, procedures and guidance.

All employees will receive training appropriate to their role and circumstances on this Policy during 2026 along with annual code of conduct training for all employees. In 2025 our Code of Conduct completion rate was 98%, during 2026 we strive to achieve 100%.

Evac applies a due diligence approach consistent with emerging regulatory expectations, including identifying and assessing risks, implementing preventive and corrective actions, monitoring effectiveness, and adapting business practices where necessary.

5. Monitoring compliance and effectiveness

The company aims to conduct regular risk assessments to verify compliance with this policy and track its effectiveness. The assessments include, as appropriate, a combination of internal audits, feedback from stakeholders, qualitative and quantitative data.

Documentation of the actions taken to meeting the due diligence responsibilities described in this Policy, including supporting evidence, should be retained to demonstrate compliance for at least 5 years from the date it was obtained, or as long as required by applicable law.

We have an Occupational Health and Safety Policy and related program 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 <2.5), the number of safety observations (263), the number of safety actions (263) and the 98% of our personnel who have completed our Safety e-learning in 2025, we aim to have 100% in 2026. We recognize that many of our potentially most severe human rights risks and impacts derive from our value 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 long-term target is to have 100% of our direct spend covered by suppliers that have signed Supplier Code of Conduct by 2030. By end of 2025 we reached 86% for the Group.

6. Reporting concerns

Should any Evac employee, worker in our value chain, partner, affected community 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 behaviour 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 behaviour 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 3rd party operated channel. All messages are investigated confidentially.

Evac do not tolerate any form of retaliation against people raising concerns for reporting a genuine concern regarding suspected wrongdoings.

7. Periodic review and update of this policy

The Evac Group 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 Group Leadership Team has assigned responsibility for the implementation of our Human Rights Policy to 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 our own operations and value chain.

The Policy will be updated as appropriate following a significant change or will be reviewed and updated every 24 months to allow us to communicate our evolving approach on human rights. The reviewing and revising process includes assessing performance, gathering feedback from relevant stakeholders, identifying update needs, revising, gaining management and board approval, and implementing the updated policy. The policy review process is initiated and governed by the Sustainability steering group.

Evac annually communicates our progress through sustainability reporting in our annual review, as well as in accordance with applicable laws. Furthermore, we report voluntarily our annual Communication on Progress as a member of the UN Global Compact.

8. Links with other Evac policies and procedures

- Evac Group Code of Conduct
- Evac Group Supplier code of conduct
- Evac Group Health and safety policy
- Recruitment policy
- Diversity and Inclusion policy
- Evac Group environmental policy
- Evac Group Whistleblowing policy
- Whistleblowing channel

Revision history

REV. NO.	DESCRIPTION	AUTHOR	APPROVER	APPROVAL DATE	EFFECTIVE DATE
1	First release	Senja Koivusalo	Tapio Kolunsarka, CEO	17 June 2022	
2	Modern slavery added	Senja Koivusalo	Björn Ullbro, CEO	30 June 2024	
3	Reporting grievances, Way forward, sections	Senja Koivusalo	Björn Ullbro, CEO	17 March 2025	
4	Full review, adding implementation and monitoring effectiveness	Lauren Atherton	The Board of Directors of CAVE BidCo Oy	23 Sep 2026	1 Oct 2026



Fresh water
generation



Vacuum
systems



Wastewater
treatment



Wet waste
treatment



Dry waste
treatment



Marine growth
prevention



Corrosion
protection

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 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.

Read more about our solutions
[evac.com](https://www.evac.com)

evac
nothing to waste

Innovative water and waste
technologies on land and sea
driving a future with no waste.