



# HUMAN RIGHTS POLICY

## 1. PURPOSE

This policy sets out Marshall Group's commitment to respect internationally recognised human rights across its operations and value chain. It defines the principles guiding how the Group identifies and manages human rights impacts, risks and opportunities arising from its double materiality assessment and human rights impacts assessment, related to working conditions and labour rights, health and safety, diversity, equal treatment and non-discrimination, other work-related human rights, and impacts on affected communities and indigenous peoples. Further information on material human rights impacts, risks and opportunities is available in Marshall Group's Sustainability Report.

Marshall Group is committed to conducting its business with respect for people, integrity, and compliance with applicable laws and ethical standards. Respect for human rights is a fundamental principle of the Marshall Group Employee Code of Conduct and an integral part of the Group's sustainability ambition to put people first across everything it does.

The ambition of this policy is prevention, risk management, and responsible remediation. It aims to prevent human rights violations, mitigate risks where they may occur, and ensure that appropriate action is taken if adverse impacts are identified. The policy supports Marshall Group's strategy and business model by reinforcing a responsible and resilient value chain, maintaining trust with stakeholders and safeguarding long-term value creation.

This policy is aligned with and informed by internationally recognised standards and frameworks, including the European Sustainability Reporting Standards (ESRS), the United Nations Guiding Principles on Business and Human Rights (UNGPs), the ILO Declaration on Fundamental Principles and Rights at Work, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the UN Global Compact Ten Principles.

The policy is part of Marshall Group's broader governance framework and is supported by internal governing documents and processes, including the Marshall Group Employee Code of Conduct and the Marshall Group Supplier Code of Conduct. It is further supported by relevant due diligence processes and the Group's whistleblowing mechanism, which enables employees and business partners to raise concerns related to potential human rights violations.

## 2. DEFINITIONS

**Affected communities** – People or groups living or working in the same area that have been or may be affected by Marshall Group's operations or through its upstream and downstream value chain. Affected communities can range from those living adjacent to the Group's operations (local

communities) to those living at a distance and include actually and potentially affected indigenous peoples.

**Business partners** – Suppliers, contractors, distributors, agents and other third parties with whom Marshall Group have a business relationship.

**Double materiality** – The double materiality assessment is a documented process aligned with the European Sustainability Reporting Standards (ESRS) requirements. The process is repeated periodically and when significant changes occur, uses relevant data sources and stakeholder inputs where appropriate, and informs strategy, target setting, supplier engagement and investment decisions. The double materiality has two dimensions: impact materiality and financial materiality. A sustainability topic meets the criterion of double materiality if it is material from the impact perspective or the financial perspective or both.

**Human rights** – The basic rights and freedoms inherent to all people, as expressed in internationally recognised standards, including the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

**Mitigation** – Actions taken to prevent, reduce or minimise the likelihood or severity of adverse human rights impacts.

**Remediation** – Actions taken to address and remedy adverse human rights impacts that Marshall Group has caused or contributed to, or that are directly linked to its operations, products or services through business relationships.

**Value chain** – All activities, resources and relationships related to Marshall Group's business, including upstream suppliers and sub-suppliers, contractors, logistics partners, distributors and other business relationships.

### 3. SCOPE

This policy applies to all employees of Marshall Group and its subsidiaries, including temporary employees, interns, consultants and contractors working under the direction of Marshall Group. It is also relevant to business partners and other stakeholders connected to Marshall Group's value chain where human rights risks or impacts are linked to Marshall Group's activities, products or services.

The policy covers Marshall Group's own operations as well as business partners and other entities in the upstream and downstream value chain where human rights impacts or risks are caused, contributed to, or directly linked to Marshall Group's activities, products or services.

Affected stakeholder groups covered by this policy include Marshall Group's own workforce, workers in the value chain and other stakeholders whose rights may be impacted through the Group's operations or business relationships.

## **4. COMMITMENT**

Marshall Group is committed to integrating human rights considerations into its business decisions, operations, and value chain management. The Group seeks to avoid causing or contributing to adverse human rights impacts through its own activities and to address impacts that are directly linked to its operations, products or services through business relationships. Respect for human rights is a strategic priority that supports long-term value creation, regulatory compliance and business resilience.

### **Working conditions and labour rights**

Marshall Group promotes fair and decent working conditions in its own operations and across its value chain. The Group upholds fundamental labour rights, including freedom of association and collective bargaining, and is committed to eliminating forced labour, child labour and discrimination in employment and occupation. This includes expectations relating to compliance with applicable labour laws, reasonable working hours and safe working conditions in line with applicable laws and internationally recognised standards.

### **Health and safety**

Marshall Group is committed to protecting the health, safety and wellbeing of employees, value chain workers, contractors and others affected by its operations. The Group works proactively to prevent workplace injuries and occupational illnesses and to promote a safe, healthy and supportive working environment, including both physical and psychological wellbeing.

### **Diversity, equal treatment and non-discrimination**

Marshall Group promotes a diverse, inclusive and respectful working environment. Discrimination, harassment, bullying or retaliation are not tolerated. Equal opportunities shall be provided regardless of gender, gender identity, sexual orientation, age, nationality, ethnicity, religion, disability or other protected characteristics.

### **Other work-related human rights**

Marshall Group is committed to preventing and eliminating forced labour, trafficking and child labour within its own operations and throughout its value chain. This includes clear expectations in line with applicable laws and internationally recognised human rights standards.

### **Environment**

Marshall Group recognises that environmental conditions and access to natural resources are closely linked to the enjoyment of human rights. Environmental harm, including pollution, climate change impacts, ecosystem degradation, and the depletion or scarcity of natural resources, can adversely affect rights such as health, water, food, housing, livelihoods and cultural rights. Marshall Group seeks to prevent and mitigate environmental impacts that may cause or contribute to adverse human rights impacts in its operations and value chain, in line with applicable laws, internationally recognised standards, and Marshall Group Environmental Policy.

### **Affected communities and indigenous peoples**

Marshall Group recognises the rights of local communities and indigenous peoples who may be affected by activities in its value chain and works to prevent and address adverse impacts on their civil, political, economic, social and cultural rights, including rights related to land, water, housing and the protection of indigenous peoples.

## **4. IMPLEMENTATION**

Marshall Group integrates human rights considerations into its due diligence processes to identify, assess and manage actual and potential human rights impacts and risks in its own operations and across its value chain. This includes assessing risks in operations and business relationships, taking preventive or mitigating measures where appropriate, and monitoring the effectiveness of actions taken. In doing so, Marshall Group pays particular attention to safeguarding vulnerable groups, including women, children, indigenous peoples, persons with disabilities and migrant workers, recognising that they may be disproportionately affected by adverse impacts.

### **Speak-up and remediation**

Marshall Group encourages employees and business partners to raise concerns, suggest improvements and report potential human rights violations through appropriate channels, including management, relevant functions or the Group's whistleblowing mechanism: (<https://report.whistleb.com/en/marshallgroup>). Reports made in good faith are protected against retaliation.

Where Marshall Group has caused or contributed to adverse human rights impacts, it aims to provide for or cooperate in remediation. Where impacts are directly linked to the Group through business relationships, Marshall Group seeks to use its leverage to contribute to appropriate remediation, in line with internationally recognised standards.

## **5. MONITORING, COMPLIANCE AND ACCOUNTABILITY**

Adherence to this policy is supported through ongoing human rights due diligence processes, value chain engagement, and the follow-up of any concerns raised through established reporting channels. Any identified non-compliance may lead to corrective actions in accordance with applicable legislation, contractual requirements, and internal procedures.

The Vice President, Communications & Sustainability at Marshall Group AB is the designated policy owner and is responsible for conducting regular reviews to ensure the policy remains accurate, up to date and properly implemented.

This policy has been approved by the CEO of Marshall Group. The policy owner is responsible for communicating the governing document to all relevant stakeholders and maintained on the company's intranet and homepage.

## **6. FURTHER INFORMATION AND UPDATES**

The policy shall be reviewed periodically, no less than every three years, and renewed approval shall be obtained from the authorised approver. The latest version of this policy is available on Marshall Group's website and intranet. Updates are communicated through relevant internal communication channels. Where applicable, material changes are reflected in the Group's Sustainability Report.

## **7. REFERENCES**

This policy is informed by and aligned with the following internationally recognised standards and frameworks:

- United Nations Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- UN Global Compact Ten Principles

This policy is supported by and implemented in conjunction with Marshall Group's internal governing documents and processes, including:

- Marshall Group Employee Code of Conduct
- Marshall Group Supplier Code of Conduct
- Marshall Group Environmental Policy
- Marshall Group Whistleblowing Policy