

SOL's Human rights policy and principles

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Document summary

- **Purpose.** This Human Rights Policy defines SOL's commitment to respecting internationally recognised human rights and describes the principles according to which human rights are integrated into SOL's operations, governance, decision-making, people practices and business relationships. The Policy provides the framework for SOL's human rights due diligence process, through which adverse impacts on people arising from SOL's operations or business relationships are identified, prevented, mitigated, monitored and, where necessary, corrected. SOL's human rights work is based on examining the impacts of business activities on people, meaning rights-holders. SOL's rights-holders include, among others, its own employees, job applicants, agency workers, workers of subcontractors and suppliers, customers, end users, and other people or groups who may be affected by SOL's operations, services or business relationships.
- **Scope.** This Human Rights Policy applies to the entire SOL Group and all its companies, as well as to human rights-holders in SOL's supply chain.
- **Responsibilities.** SOL Group's Management Team approves this Human Rights Policy and is responsible for ensuring that human rights commitments are taken into account in the operations of SOL Group companies.

SOL's business is based on work performed by people. Particular attention is therefore paid to safe and healthy working conditions, fair treatment, reasonable workloads, understandable communication, workers' ability to raise concerns, and the realisation of the rights of workers in vulnerable situations.

SOL's human rights due diligence process is an ongoing, risk-based process for identifying, preventing, monitoring and correcting adverse impacts on people. SOL Group's Management Team approves this Human Rights Policy and is responsible for ensuring that human rights commitments are taken into account in the operations of SOL Group companies.

The Policy is owned by SOL's Sustainability function in cooperation with Human Resources, Legal, Procurement, Occupational Safety and Health, and business management. SOL's business units are responsible for implementing the Policy within their respective areas of responsibility.

1. Purpose

This Human Rights Policy defines SOL's commitment to respecting internationally recognised human rights and describes the principles according to which human rights are integrated into SOL's operations, governance, decision-making, people practices and business relationships.

The Policy provides the framework for SOL's human rights due diligence process, through which adverse impacts on people arising from SOL's operations or business relationships are identified, prevented, mitigated, monitored and, where necessary, corrected. SOL's human rights work is based on examining the impacts of business activities on people, meaning rights-holders. SOL's rights-holders include, among others, its own employees, job applicants, agency workers, workers of subcontractors and suppliers, customers, end users, and other people or groups who may be affected by SOL's operations, services or business relationships.

2. Applicability

This Policy applies to all SOL companies, business operations, management, supervisors, employees and other persons acting on behalf of SOL. The Policy applies to SOL's own operations and, where applicable, to business relationships such as suppliers, subcontractors, partners and other actors in the value chain.

SOL expects its business partners to respect internationally recognised human rights and to follow corresponding principles in their own operations. Particular attention is paid to situations in which SOL's services are delivered at customer sites, in subcontracting chains or in other business relationships where responsibilities may be dispersed and workers may be in a vulnerable situation.

This Policy complements SOL's Code of Conduct, Supplier Code of Conduct and Policy on Reporting and Handling Misconduct and Whistleblower Protection. Together with SOL's other people, procurement, occupational safety and health, legal and compliance, and

sustainability policies and guidance, these documents form a common framework for taking human rights into account in SOL's own operations and business relationships.

3. Principles guiding SOL's human rights work

SOL's human rights work is guided by the following principles:

Respect for human rights

We respect internationally recognised human rights in all our activities and expect the same from our business partners. SOL's human rights responsibility is based on the "do no harm" principle: a company should avoid causing or contributing to adverse human rights impacts and seek to prevent or mitigate impacts that are directly linked to its operations, services or business relationships.

Compliance with laws and international standards

We comply with applicable legislation and internationally recognised human rights and labour standards in the countries where we operate.

Risk-based human rights due diligence

Through a risk-based human rights due diligence process, we identify, assess, prevent, mitigate and monitor adverse human rights impacts and, where necessary, take corrective action.

Raising concerns, access to remedy and corrective action

We provide workers and other stakeholders with accessible, confidential and safe channels for raising concerns and problems. We are committed to handling reports impartially, protecting reporting persons from retaliation and taking necessary corrective action. Further information is provided in SOL's Policy on Reporting and Handling Misconduct and Protecting Reporting Persons (Whistleblowing Policy).

Stakeholder engagement and consideration of groups in vulnerable situations

We listen to workers and other rights-holders and pay particular attention to groups in vulnerable situations. In SOL's business, such groups include, for example, people who may have fewer opportunities to obtain information, exercise their rights, seek help or obtain corrective action due to language proficiency, economic dependency, uncertainty relating to residence permits, social isolation or limited experience of working life, such as young people.

Responsibility, training and continuous improvement

We ensure that responsibilities, training, monitoring and continuous improvement are established for our human rights work. Our objective is to build a clear, risk-based and ongoing process through which human rights impacts can be identified, prevented, mitigated and corrected.

4. Our commitment to international human rights standards

SOL is committed to respecting internationally recognised human rights and following the United Nations Guiding Principles on Business and Human Rights. SOL also takes the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct into account in its human rights work, where applicable.

The international foundation of SOL's human rights work includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the ILO Declaration on Fundamental Principles and Rights at Work. SOL is also committed to implementing the United Nations Global Compact principles and contributing to the Sustainable Development Goals (SDGs).

4.1 SOL's key human rights commitments

Zero tolerance for forced labour, human trafficking and worker exploitation

SOL does not tolerate forced labour, human trafficking, worker exploitation, recruitment fees or other extortion, withholding of wages, retention of identity documents, or restrictions on workers' freedom of movement in its own operations or business relationships.

Prohibition of child labour

SOL does not tolerate child labour in its own operations or business relationships. SOL complies with applicable legislation and international minimum-age standards.

Non-discrimination and equality

SOL respects the dignity and equality of every person. SOL does not tolerate discrimination, harassment, inappropriate treatment, intimidation, degrading treatment or abuse of power.

Safe and healthy working conditions

SOL is committed to promoting safe and healthy working conditions. This means adequate induction, understandable instructions, site-specific risk assessments, appropriate work equipment, safety management and worker participation in improving safety.

Reasonable terms and conditions of employment, rest and workload management

SOL is committed to working-time practices and appropriate work allocation that support workers' health, safety and well-being. Workers must be able to take breaks, perform their work safely within the agreed time and raise concerns about workload.

Freedom of association and the right to collective bargaining

SOL respects workers' right to organise, participate in collective bargaining and use lawful representative channels without discrimination or retaliation.

Protection of the rights of workers in vulnerable situations

SOL recognises that workers with a foreign background, workers with limited language proficiency or literacy, part-time workers, new workers, young people, students, lone workers and other groups in vulnerable situations may be particularly exposed to adverse human rights impacts.

Privacy and protection of personal data

SOL respects the privacy of workers and other stakeholders and protects personal data in accordance with applicable legislation and internal guidance.

5. Human rights governance and responsibilities at SOL

SOL's human rights work is integrated into governance, risk management, sustainability work, people processes, occupational safety and health, procurement, legal operations and day-to-day business management.

SOL's management is responsible for integrating human rights commitments into decision-making, management systems and business development.

SOL ensures implementation through training, guidance, high-quality supervisory work, monitoring, risk-based assessments, audits, reporting channels and corrective action. SOL sets quantitative and qualitative objectives for its human rights work and the realisation of labour rights. These may include induction and training coverage, reduction of occupational accidents, coverage of occupational safety and health risk assessments,

awareness of reporting channels, case-handling times, employee survey results and implementation of identified corrective actions.

6. SOL's material human rights impacts and human rights risks

SOL recognises that its operations and business relationships are associated with human rights impacts whose nature and significance vary according to the activity, workforce structure, working environment and business relationship.

To date, SOL's human rights impact assessment has focused particularly on impacts on its own workforce. As part of the human rights due diligence process, the assessment will be expanded on a risk basis to other rights-holders and parts of the value chain.

The identification of human rights impacts is based on internal observations, feedback from workers and stakeholders, occupational safety and health and HR data, findings from reporting and feedback channels, the results of the double materiality assessment and Group risk analysis, and, where applicable, external studies and information from public authorities and organisations.

Key human rights impacts identified by SOL

Impact category	How the impact may arise
Risks to physical health and safety	Impacts may arise, for example, from accident hazards, chemicals and other exposures, risk of infection, poor ergonomics, work equipment and machinery, lone working, hazardous working environments and weather conditions.
Risks to mental health and safety	Impacts may take the form of psychological strain, feelings of insecurity, inadequate support, and strain caused by aggressive encounters, time pressure or unpredictability of work.
Inadequate or unfair pay and other compensation	Impacts may relate, for example, to pay insufficient for living expenses, insufficient working hours, unpaid additional work or overtime, payroll and working-time errors, or unequal pay or compensation practices.
Excessive or unpredictable working hours and insufficient rest	Impacts may take the form of excessive workloads and overtime, missed breaks, working during personal time, blurred boundaries between work and private life, and unpredictable work schedules.
Discrimination and unequal treatment	Impacts may relate, for example, to recruitment, pay and compensation, the allocation of shifts and additional work, sickness absence and occupational health practices, or other unequal treatment.

Inappropriate treatment, harassment and violations of dignity	Impacts may take the form of inappropriate treatment, harassment, intimidation, abuse of power or other conduct that violates human dignity or a sense of safety.
Labour and economic exploitation and risk of forced labour	Impacts may relate, for example, to extortion, recruitment fees, economic pressure, unpaid work, unjustified wage deductions or other exploitation of a worker's dependent position.
Risks to privacy and the protection of personal data	Impacts may relate to risks to the privacy or personal data of workers, customers or other persons, for example where information becomes accessible to unauthorised parties.

SOL's human rights risks

SOL assesses identified actual and potential adverse human rights impacts as part of its human rights due diligence process. The severity of impacts is assessed based on their scale, scope and irremediable character. For potential impacts, the likelihood of occurrence is also taken into account.

To date, SOL's human rights impact assessment has highlighted impacts relating particularly to workers' physical and mental health and safety, working time and workload, pay and other compensation, equal and appropriate treatment, and the prevention of labour exploitation.

Factors that may increase the risk of an impact occurring or becoming more severe include the dispersed nature of work at customer sites, work across multiple locations, lone and night work, hazardous working environments and weather conditions, urgency and time pressure, and supervisors' broad areas of responsibility. Gaps in accessible communication and difficulties in obtaining information in an understandable form may also limit workers' ability to understand instructions, exercise their rights and raise concerns.

Factors that may increase a worker's vulnerability include limited language proficiency or literacy, limited experience of working life, limited awareness of their rights, economic or other dependency on the employer, and a high threshold for raising concerns or seeking help. SOL pays particular attention to situations where several factors increasing vulnerability accumulate. To date, such factors have been identified particularly among some workers with a foreign background, as well as young people, students, persons with partial work ability and workers in their first jobs.

7. SOL's approach to human rights due diligence, reporting concerns and corrective action

Human rights due diligence

SOL carries out human rights due diligence in accordance with the United Nations Guiding Principles on Business and Human Rights. The process covers identifying and assessing adverse impacts, preventing and mitigating impacts, tracking the effectiveness of actions, communicating how impacts are addressed, and taking corrective action where SOL has caused or contributed to an adverse impact.

SOL's human rights due diligence is an ongoing, risk-based process. The prioritisation of risks and related actions is based on the severity of impacts on people: priority is given to risks that may be the most severe, widespread or difficult to remedy, and to situations where impacts affect persons or groups in vulnerable situations.

Reporting concerns

SOL encourages workers and other stakeholders to raise human rights-related concerns, problems and suspected misconduct as early as possible. Concerns may be raised through several channels, including a supervisor, the supervisor's manager, a worker representative, Human Resources, Occupational Safety and Health, SOL's management or Legal. If these channels do not feel appropriate, or if the reporting person wishes to report anonymously, the report may be submitted through SOL's whistleblowing channel. External stakeholders may also use the externally available whistleblowing channel on SOL's website.

Reports submitted through the whistleblowing channel are received, handled and followed up, and reporting persons are protected, in accordance with the procedures and time limits described in SOL's Policy on Reporting and Handling Misconduct and Protecting Reporting Persons (Whistleblowing Policy). Not all human rights concerns necessarily fall within the scope of the whistleblowing procedure. Routine operational matters and questions concerning work arrangements or terms and conditions of employment are primarily handled through the appropriate HR, occupational safety and health or management processes, unless they involve a suspected breach of law, SOL's Code of Conduct, responsible business principles or other internal guidance.

SOL handles human rights-related reports confidentially, with respect for data protection and impartially. Persons involved in an investigation must be independent of the matter and its parties. Potential conflicts of interest are identified, and persons with a conflict do not participate in handling the matter. Information is shared only to the extent required for investigating the matter, taking corrective action or complying with legal obligations. SOL seeks to ensure that reporting channels are understandable and accessible also to people with limited language proficiency, lower literacy, uncertain status or another factor increasing vulnerability. Subject to local law, the whistleblowing channel enables reports to

be made safely and anonymously if desired, and the reporting person may submit a report in the language of their choice.

Retaliation

SOL does not tolerate retaliation of any kind against a person who, in good faith, reports a human rights-related concern, suspicion or problem or participates in an investigation. Prohibited retaliation includes threats, pressure, discriminatory or hostile treatment, obstruction of work, isolation, an unjustified reduction in status or duties, unjustified disciplinary action, prevention of reporting, or a breach of the reporting person's confidentiality. Good faith does not require the reporting person to be correct or to have complete evidence, but means that the report is not knowingly false, misleading or malicious.

SOL respects the activities of civil society, trade unions, worker representatives and other human rights defenders. SOL does not tolerate interference with or obstruction of their work in its own operations or business relationships.

Corrective action

Where SOL identifies that it has caused or contributed to an adverse human rights impact, SOL takes appropriate corrective action. Depending on the circumstances, corrective action may include remedying the situation, paying an outstanding amount, changing work arrangements, improving induction or guidance, mediation, training, disciplinary action, changing processes, cooperation with public authorities, or other appropriate redress. Where human rights-related problems are identified in supplier, subcontractor or other business relationships, SOL investigates the matter, engages with the relevant business partner and seeks, by using its leverage, to ensure that appropriate corrective action is taken. In serious or repeated cases, SOL assesses whether the conditions for continuing the business relationship remain in place.

SOL often cannot resolve human rights-related problems alone. It therefore seeks to increase its leverage by cooperating with customers and public authorities, participating in industry development, and using its leverage with suppliers and partners.

Monitoring

SOL monitors the effectiveness of its human rights actions using quantitative and qualitative indicators. These may include employee surveys, induction and training coverage, use and awareness of reporting channels, case-handling times, audit findings, the coverage of risk assessments, occupational accidents, near misses, sickness absence, employee turnover and open feedback.

Findings from reports, investigations and corrective actions are used in SOL's human rights due diligence process, risk assessment, training, guidance, oversight and the development of practices. The objective is not only to correct individual harms but also to prevent similar human rights impacts from recurring.

Communication

SOL communicates internally and externally about its human rights work and this Policy. SOL raises employee awareness of its human rights commitments, reporting channels and operating practices through internal communication, induction and training.

This Policy is reviewed regularly and updated as necessary to reflect changing regulation, international standards, stakeholder expectations and new findings identified through SOL's human rights due diligence process.