

Anti-Slavery and Human Trafficking Policy

Derome has a responsibility to tackle any form of Modern Slavery. We will not tolerate any form of Modern Slavery either within our own operations or throughout our supply chain. This is supported through the communication to, and compliance of, our employees, suppliers and third-party providers with Derome Anti-Slavery and Human Trafficking Policy.

Purpose and Scope

The purpose of this policy is to communicate and establish controls to ensure compliance with all Anti-slavery and Human trafficking regulations as well as ensuring alignment to the organisation's ethical standards and Code of Conduct. The policy covers all Derome employees, suppliers and third-party providers and is intended to ensure that all are aware of the responsibilities they hold.

Derome has policies and statements relevant to Modern Slavery which should be read in conjunction with and supplement this policy. These include Code of Conduct and whistleblowing policies which are published on Derome's website.

What is Modern Slavery?

Modern Slavery is a violation of fundamental human rights and a crime. It is a term used to embody slavery, servitude, forced compulsory labour, bonded and child labour and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial benefit. As product manufacturing and distribution supply chains are often complex, we must ensure we address the eradication of Modern Slavery throughout our complete supply chain and not just focus on the end product. We must also consider our third-party and service providers employed to support both the product and service offer we give to our customers and stakeholders. We acknowledge that there is no typical victim of Modern Slavery, and some victims do not understand that they have been exploited and are entitled to help and support. However, the following signs could indicate that someone may be a victim of Modern Slavery or human trafficking:

- The person is not in possession of their own passport, identification or travel documents
- The person is acting as though they are being instructed or coached by someone else
- The person allows others to speak for them when spoken to directly
- The person is dropped off and collected from work
- The person avoids eye contact, is withdrawn or appears frightened
- The person does not seem to be able to contact friends or family freely
- The person has limited social interaction or contact with people outside of their immediate environment.

The above list is not exhaustive.

A person may display a number of the indicators set out above, and yet not necessarily be a victim of slavery or trafficking.

Our Policy

Our policy does not allow for any form of slavery or human trafficking and we will take steps to ensure that Modern Slavery is not taking place in any part of our business or supply chains. Derome will not engage with organisations which facilitate any form of slavery including the use of child labour or forced labour. We require that the suppliers and third-parties we work with should require the same standards in their downstream supply chains.

Our zero-tolerance approach to Modern Slavery includes our commitment that:

- we will not allow any form of slavery or human trafficking to take place in any part of our business.
- we will not use child labour, nor will we use forced labour.
- we recognise freedom of association and have a collective bargaining agreement in line with local laws.
- we will comply with all relevant laws, statutes and regulations relating to Modern Slavery
- we will publish Modern Slavery Statements in accordance with the relevant legislation
- we require our suppliers and third-party providers to comply with the above; and to hold their own suppliers and third-parties to the same standards:
- we will seek to educate and raise awareness across our business in the identification and reporting of Modern Slavery.

Compliance

The prevention, detection and reporting of Modern Slavery in any part of our business or supply chain is the responsibility of all those working within it. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives, business partners and suppliers. We expect the highest standards of compliance to be upheld at all times.

Derome has a risk-based approach to our contracting processes where suppliers or proposed suppliers are provided with our Code of conduct and related policies. We preserve the right to audit our supplier's activities at all times of any reasonable suspicion. If we find that other individuals or organizations working on our behalf have breached this policy, we will ensure that we take appropriate action.

Reporting Modern Slavery

Employees, suppliers and third-party providers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a violation of this policy. If you are a Derome employee you must report any incidence or suspicion of Modern Slavery and/or human trafficking in any part of our business or supply chain to your direct manager or Derome's Head of Sustainability. Alternatively, employees can report any concerns using Derome's whistleblowing process. We encourage openness and will support anyone who raises genuine concerns with the whistleblowing policy, even if they turn out to be mistaken. As well as employees, suppliers and other business partners can confidentially report any serious concerns by email to: whistleblowerderome@gmail.com

The information will be treated with confidentiality, and we prohibit retaliation against any party who, in good faith, reports a violation to us.

Responsibility and Implementation

Our Board of Directors has overall accountability for ensuring that this policy complies with our legal and ethical obligations, and that all our people comply with it. Derome's Head of sustainability is responsible for the policy implementation and appropriate communication of this policy to all relevant employees together with associated training programs.

Veddige, November 2022



Magnus Andersson, CEO Derome Group