

## Human and labor rights policy

The policy is guided by the human rights enshrined in the Universal Declaration of Human Rights (1948), the two international covenants on civil and political rights (1966) and economic, social, and cultural rights (1966) and the core conventions of the International Labour Organization (ILO). The associated work on supply chain due diligence is guided by the Norwegian Transparency Act of 2021 and the OECD (Organisation for Economic Cooperation and Development) Due Diligence Guidance.



### Respect for Human & Labor Rights

Respect for human rights and decent working conditions are intrinsic to TOMRA's values. TOMRA strives to be transparent on the related risks in our supply chains, production, and services offered both following the expectations of our stakeholders as well as meeting relevant regulations and international standards. This policy lays out TOMRA's guiding principles for handling human and labor rights in all business activities.

TOMRA is committed to respecting the UN Guiding Principles on Business and Human Rights,<sup>1</sup> human rights enshrined in the Universal Declaration of Human Rights<sup>2</sup> (1948), the two international covenants on civil and political rights (1966) and economic, social, and cultural rights (1966) and the core conventions of the International Labour Organization (ILO).<sup>3</sup> The associated work on supply chain due diligence complies with the Norwegian Transparency Act of 2021 and the OECD (Organisation for Economic Cooperation and Development) Due Diligence Guidance.<sup>4</sup>

TOMRA operates across all major regions and markets with a global value chain. TOMRA sets high standards of performance and ethical behavior for all employees, suppliers, and partners. These are guided through our Code of Conduct, Business Principles for Suppliers and Partners, and topic-specific policies helping TOMRA maintain fair business and labor practices.

TOMRA's human and labor rights supplier due diligence procedures and reporting are approved by the Board of Directors and designed to follow the above-mentioned international laws and standards, using the OECD due diligence process throughout our supply chain. This includes regular engagement and supply chain due diligence exercises with suppliers, contractors, and other business partners to contribute, both directly and indirectly, to the general wellbeing of the communities in which we work, and to find, prevent and mitigate actual and potential adverse impacts in our own operations, the supply chain and other business relationships.

TOMRA's annual report on the due diligence process, available on our [homepage](#), covers the activities conducted to find and address actual or potential adverse impacts, any findings, or weaknesses in the supply chain and necessary later actions.

1. United Nations, "The UN Guiding Principles on Business and Human Rights," 2011, [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf).
2. United Nations, "Universal Declaration of Human Rights," 1948, <https://www.un.org/sites/un2.un.org/files/2021/03/udhr.pdf>.
3. ILO, "The International Labour Organization's Fundamental Conventions," 2004, <https://www.ilo.org/publications/international-labour-organizations-fundamental-conventions>
4. OECD, "OECD Due Diligence Guidance for Responsible Business Conduct," 2018, <https://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>.

## Principles & Scope for Addressing Human and Labor Rights

All TOMRA companies, employees and consultants shall work according to our Code of Conduct and policies to respect and safeguard human and labor rights. The same is expected for all suppliers and their supply chains per the Business Principles for Suppliers and Partners.

The work shall be performed in a systematic manner to respect human rights, in line with the principles described below.

### Labor Rights:

TOMRA will follow relevant international human rights laws related to safety and health, working hours, wages and benefits, and the right to organize. Employees are paid in a prompt fashion that meets or exceeds the minimum legal standard in each market.

### Discrimination:

TOMRA is committed to an inclusive work culture and does not accept any form of discrimination based on ethnicity, color, religion, gender, sexual orientation, gender identity, marital status, national origin, union membership, age, mental or physical disability, amnesty, or any other status protected by applicable law without this list being considered exhaustive.

### Safe & Hygienic Working Conditions:

TOMRA is committed to the goal of doing no harm to people on our facilities, job sites or communities we serve. Every TOMRA company, contractor, and supplier must have a systematic approach to the management of Health, Safety, Security and Environment (HSSE), designed to ensure regulatory compliance.

### Harsh or Inhumane Treatment:

TOMRA will not tolerate any form of harassment. We will not tolerate any acts of physical, verbal, sexual or psychological harassment, bullying, abuse, or threats in the workplace. We will not tolerate any action, conduct or behavior which is humiliating, intimidating, offensive or hostile.

### Child Labor:

TOMRA and its suppliers and partners will not use child labor. The term “child” refers to any person employed where the age of employment is not following the minimal age required by international laws.

### Forced Labor:

TOMRA opposes all forms of involuntary labor of any type (e.g., modern slavery, forced, bonded, indentured or involuntary prison labor).

### Human Trafficking:

TOMRA, and its suppliers and partners, will not engage, directly or indirectly, in human trafficking. TOMRA and its suppliers and partners will not engage in any unlawful act of transporting or coercing people to benefit from their work or service.

### Indigenous & Tribal People’s Rights:

TOMRA respects the right of indigenous and tribal people to the use of land and water in their historically inhabited geographical regions.

### Community Rights:

TOMRA recognizes the impact on the communities in which we work. We are committed to engaging with stakeholders in those communities to ensure that we listen to, learn from, and consider their views.



## Remedy and Grievance

TOMRA is committed to continually strive to identify potential and actual adverse human and labor rights impacts, caused by our operations, and prevent, mitigate, and remedy such impacts.

TOMRA employees and other stakeholders are expected to speak-up on unethical, illegal or other behavior against our Values, Code of Conduct, or this policy on human and labor rights on the [TOMRA Notification Portal](#) or the QR code. All notified cases are handled in confidentiality by the Compliance Department.

