Thule Group Anti-Discrimination and Harassment Policy

Thule Group AB
(Corp. Reg No. 556770-6311)

Adopted October, 2019

Issued by Kajsa von Geijer, SVP HR&Sustainability
Approved by Magnus Welander, CEO & President
Approved by Thule Group Board of Directors at the Board Meeting October 24, 2019

EN

1. Introduction and purpose

The Thule Group Anti-Discrimination Policy **(the "Policy")** is based on our obligations in applicable national law and on the UN Guiding Principles on Business and Human Rights, Principle 6 of the ten principles of the UN Global Compact, guidelines from the International Labour Organization, and the Thule Group Code of Conduct. This Policy supports Thule Group's commitment of creating and maintaining a work environment that is open, inclusive, and free from discrimination and harassments throughout our business. No one, internal employees or external candidates, should feel discriminated or harassed in the process of recruitment, promotion or employment. Thule Group recruits, promotes, and employs people based on their individual merits and skills, and encourages and supports equal opportunity. There is a zero tolerance against discrimination and harassment in all work-related activities and interpersonal relationships at work.

The Policy is based on three fundamental principles:

- **Equality** as the number one consideration. All humans are born equal. Therefore, equal treatment of all individuals regardless of ethnicity, cultural background, sex, gender identity, sexual orientation, religion, disability, age or any other factor are at the highest priority
- **Zero tolerance** against discrimination, harassment, sexual harassment and victimization
- **Respect** for individuals' differences in ethnicity, sex, gender identity, sexual orientation, culture, religion and other factors

2. Applicability of the policy

The Policy applies to the Thule Group Board of Directors, management, employees, agency workers, contractors, business partners and suppliers. This Policy shall be communicated to these parties along with the Code of Conduct. The Policy shall be read and understood on a regular basis to ensure full compliance and respect throughout Thule Group.

The Policy applies in relation to all work-related activities including but not limited to recruitment and selection, conditions and benefits, training and promotion, task allocation, shifts, hours, leave arrangements, workload, equipment, as well as to interpersonal relationships at work related situations such as travels, events, parties and after-work gatherings.

3. Definition of discrimination

3.1. Discrimination

Discrimination is any less favourable treatment or differential treatment or when a person's dignity is violated based on reasons other than merits, skills or job responsibilities. This includes, but is not limited to, less favourable or differential treatment or when a person's dignity is violated based on: race, ethnicity, sex, gender identity, religion, age, disability, sexual orientation, political opinion, or union status. Discrimination can be either intentional or unintentional and even if a person does not intend to discriminate, it could be considered an act of discrimination if it puts another person at a disadvantage. Following examples constitute examples of discrimination:

- An employee has a lower salary that a colleague of the opposite sex with same or equivalent tasks;
- A manager makes unwelcome sexual advances;
- A woman is dismissed due to pregnancy;
- An employee is refusing to cooperate with a colleague due to the colleague's faith;
- A job applicant is not offered an interview due to her foreign name;
- A customer with a disability is declined access to a company's facilities and the company has not implemented reasonable accessibility measures.

3.2. Harassment

Harassment is a form of discrimination which is strictly forbidden within Thule Group. In general, there are two types of harassments:

1. **Harassment of improper behaviour,** advances, requests, and other physical, verbal or non-verbal misconduct that are related to a person's race, ethnicity, sex, gender identity, religion, age, disability, sexual orientation, political opinion, union status or other ground. Harassment can involve one or multiple incidents, and can cause a person to feel offended, humiliated, or intimidated. Harassment includes, but is not limited to: deliberate insults, physical threat or abuse, unsubstantiated complaints, continued interference of personal work space, display of offensive material, exclusion from normal work communication, and intrusion into personal life.
2. **Sexual harassment** more specifically includes unwelcome: sexual advances, requests, verbal conduct, non-verbal conduct, physical conduct, and other forceful or coercive misconduct.

In all cases, it is the victim of harassment who decides what is unwelcome or offensive and all individuals must carefully consider how certain behaviour is perceived.

3.3. Victimization

Victimization are all acts that are directed to one or several individuals and are of an offensive character. Such acts do not need to relate to any special characteristic of the individual for example ethnicity or gender, and may include for example excessive or insufficient workload or level of demands, bullying, being moved to a position with lower responsibility without objective reasons for it, ostracising, defamation, insults, violence and withholding information. Acts of victimization could cause severe illness and employees being placed outside the workplace community. Thule Group continuously work with creating an inclusive workplace and does not tolerate any kind of victimization.

4. Reporting incidents

If an employee experiences discrimination or harassment they should report the incident to their local Human Resources department at their site as quickly as possible. Any time anyone is under threat or danger, the local police should also be notified. Note that if site HR management is involved in an incident, global Group HR shall be contacted directly.

The victim shall have the preference for interpretation and each case shall be treated seriously. Victims always have the possibility to request additional external aid, such as counselling, medical aid, and police involvement. Witnesses of incidents can be involved in the investigation if requested by the victim. The person responsible for the discrimination and the victim shall be cooperative and honest. Victims should always be able to report discrimination and harassment without threat of reprisals from management.

The following procedure, based on the four-step system, should be followed to approach a reported case of discrimination and/or harassment. These steps include:

1. Investigate discrimination/harassment incident
2. Analyse causes and risks
3. Perform corrective and preventative actions
4. Follow-up and evaluate actions.

After the incident is reported to site HR department, the following steps shall be taken in this order:

1. The site HR department shall immediately investigate the incident to determine its severity
2. The site HR department shall contact global Group HR, in order to conduct a detailed investigation
3. In severe cases, and upon agreement between global HR and the local HR, a third party may be brought in upon request for mediation or investigation
4. If necessary, the involved parties shall be released from work duties during the investigation
5. Global HR and local HR shall determine the appropriate disciplinary action(s):
    a. verbal warning
    b. written warning
    c. counselling
    d. separation of involved parties into different functions, shifts, or tasks
    e. temporary suspension
    f. permanent dismissal in severe cases
6. Upon completion of the investigation, the site HR shall summon the involved parties for either individual or group meetings depending on the case
7. The site HR will implement and follow-up the disciplinary actions

5. Grievance channels

Thule Group employees should report harassment and discrimination incidents directly to their site HR or to global HR, rather than reporting within the Thule Group Whistleblowing Tool. Note that the Thule Group Whistleblowing Tool is primarily to be used for ethical misbehaviour such as bribery, corruption, senior management misusing their status, or breaches of legal compliance. However, the Thule Group Whistle-blowing tool can be used as reporting tool if (i) the incident concerns persons in leading positions and (ii) it concerns serious cases of discrimination or harassment.

6. Implementation and Compliance

The Policy aims to ensure that the responsibility for adhering to the principles and rules presented herein are understood by each Thule Group employee. If, you after having read the Policy, have any doubts about how to act or behave, you should discuss the issues with your direct manager or with the local HR department.

6.1. Implementation and additional guidelines

This Policy as well as other additional separate policies and our Code of Conduct have been developed exclusively to establish internal standards and guidelines. They are not intended to be legally binding, to make any representation or warranty or create or extend any guarantees or warranties. Therefore, the Code of Conduct or associated policies are not addressed to any party who may claim that any legal right can be derived from those.

It is the intention of Thule Group to every second year conduct internal mapping in order to survey hidden cases of discrimination or harassments.

All employees are obliged to continually update themselves on changes and additions in all our policies without being requested to do so.

This Policy which serves as a framework document which complements each Thule Group site's local housekeeping rules and policies that also need to be followed and understood by the employees working at such site.

6.2. Compliance

This Policy is a resource for all of us and provides us with guidance on how to behave ethically towards one another. It also gives clear guidance of our values and how we believe a good work environment free from misconduct and wrong behaviour can be achieved.

Retaliation against anyone reporting a known or suspected ethical compliance concern is strictly prohibited.

6.3. Employee responsibility

Each employee of the Thule Group has a responsibility to act honestly and ethically.

The Policy and our Code of Conduct provide the framework to put Thule Group's values into action. We all have a responsibility to act with integrity, comply with applicable laws and regulations – both in letter and spirit, and to honor the Code of Conduct.

Employees are responsible for knowing, understanding, and complying with our policies and procedures, however, national laws or local collective bargaining agreements always supersede the Policy. By committing to these responsibilities, we will continue to meet the expectations of interpersonal relationships with integrity and good behaviour.

6.4. Managers' responsibility

Managers are role models and resources for employees. In regard to the Policy, Managers are expected to:

- embrace the Policy and act as role models
- maintain a workplace environment supportive of the Policy
- educate employees in the meaning and application of the Policy
- enforce the Policy

6.5. Our commitment to prevent retaliation

Ethical values and integrity are of greatest importance to the Thule Group and cannot be preserved if individuals are reluctant or afraid to raise or report a concern or a suspected breach of the Policy, Group Policies, or the law.

Rest assured, if you raise your concern in good faith, there will be no retaliation taken against you. Any employee who engages in retaliation will be subject to disciplinary action. If you believe that you have experienced retaliation, you should report it as a suspected misconduct.

Malmö 2019-09-01

Thule Group

Magnus Welander
CEO & President

Thule Group HQ
Fosievägen 13
SE – 214 31 Malmö
Telephone: +46 40 635 90 00
www.thulegroup.com