



# Forced Labor Avoidance Policy

## 1. Objectives

At delfort the use of forced labor, either in our own operations or in our supply chain, is strictly forbidden. This policy constitutes the framework for all actions taken within delfort to ensure the prevention and avoidance of forced labor in alignment with the International Labour Organization (ILO) standards, Article 5 of the Charter of Fundamental Rights of the European Union and Chapter V (Employment and Industrial Relations) of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

## 2. Scope of Policy

This policy applies to all delfort sites and employees, as well as contractors, suppliers, and business partners associated with our organization.

## 3. Our responsibility

### 3.1 General management approach

Forced Labor may not only arise in our operations, but also in our supply chain, e.g., in relation to recruitment and retention practices, subcontracting, use of recruitment agencies, state-sponsored Forced Labor.

The internationally recognized definition of forced labor is to be found in ILO Convention No. 29 as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”. This includes situations of human trafficking, debt bondage, and any form of coercion or intimidation.

### 3.2 Our forced labor avoidance approach

Our organization is committed to:

- Upholding human rights and the dignity of all individuals;
- Complying with ILO conventions, particularly Convention No. 29 on Forced Labor and Convention No. 105 on the Abolition of Forced Labor;
- Complying with Article 5 of the Charter of Fundamental Rights of the European Union
- Complying with OECD Guidelines für Multinational Enterprises on Responsible Business Conduct, particularly Chapter V. Employment and Industrial Relations;
- Promoting fair labor practices throughout our operations and supply chains.

We maintain a zero-tolerance stance toward forced labor and exploitation in any form.



#### 4. Guiding principles

We have defined the following guiding principles:

- **Risk assessments:** we will conduct regular assessments to identify potential risks of forced labor within our operations and supply chain and take proactive measures to mitigate those risks. In our risk analysis, we will consider, among others, country risk factors, factors linked to migration and informality, presence of debt risk factors.
- **Recruitment Practices:** All recruitment must be conducted transparently, with no fees charged to workers. Workers must be provided with clear and accurate information about their employment conditions.
- **Contracts and Documentation:** Employment contracts must be in a language understood by the worker, outlining the terms of employment. Workers must never have their personal documents (e.g., passports) taken from them by their employer.
- **Monitoring and Auditing:** Regular audits and assessments of labor practices within our operations and supply chains will be conducted to ensure compliance with this policy.
- **Reporting Mechanisms:** All Employees are encouraged to report any suspected forced labor practices without fear of retaliation through our Whistleblower Hotline. All reports will be investigated promptly and thoroughly.

#### 5. Remediation

Forced Labor is a crime. Where we have caused or contributed to Forced Labor, we will cooperate with local authorities to help provide appropriate forms of remedy.

This includes to

- seek to restore the affected person or persons and enable remediation that is proportionate to the significance and scale of the adverse impact;
- consult and engage with impacted rights holders and their representatives in the determination of the appropriate remedy;
- ensure that appropriate measures are implemented to prevent recurrence.

#### 6. Implementation and Compliance

To ensure full and continued compliance with this policy or react to non-compliances within our own operations, HR will conduct periodic self-evaluations and checks, where relevant also in coordination with the Head of Corporate HR.

For new suppliers, compliance to this policy is part of our due diligence process. For existing suppliers, we conduct periodic checks based on relevant risk factors, where relevant also in coordination with the respective corporate director (HR or Procurement).

We have defined an internal procedure for risk assessment, addressing identified risks, handling of state-sponsored forced labor and responsible disengagement as a last resort after failed attempts at preventing or mitigating severe impacts.



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We will build awareness with key company staff (such as managing directors of our sites, HR managers, employees in purchasing departments) and suppliers on what constitutes Forced Labor and Human Trafficking, equipping them with the knowledge to identify and report potential violations.

Suppliers and staff will not face reprisals for reporting risk or instances of Forced Labor, and instead are encouraged to report risk or instances of Forced Labor.

## 7. Annual Review

This Policy will be reviewed annually by the Board of Directors and the Head Corporate HR and amended as appropriate.

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