



GARO GROUP

Anti-Discrimination and Harassment Policy

GARO Group AB and its affiliates (or the "Company") (Corp. Reg No. 556051-7772)

Originally adopted October 18, 2024.

Issued by Andreas Olsson, Sustainability Manager

Approved by Joseph Ree, CEO GARO Group





CONTENTS

- 1. INTRODUCTION AND PURPOSE 3**
- 2. SCOPE AND APPLICABILITY..... 3**
 - 1.1. Scope..... 3
 - 1.2. Definition of Discrimination 3
 - 1.3. Definition of Harassment..... 3
 - 1.4. Victimization 3
- 3. REPORTING INCIDENTS 3**
- 4. GRIEVANCE CHANNELS 4**
- 5. IMPLEMENTATION AND COMPLIANCE..... 4**
- 6. EMPLOYEE AND MANAGER RESPONSIBILITY..... 4**
- 7. OUR COMMITMENT TO PREVENT RETALIATION 4**
- 8. REVIEW, VIOLATION AND CONTACT INFORMATION 4**



1. INTRODUCTION AND PURPOSE

GARO Group are committed to fostering a work environment that values respect, inclusion, and equality. This policy aims to ensure that all employees, whether within the organizations or external candidates, experience an atmosphere free from discrimination and harassment. Discrimination and harassment in any work-related activities and interpersonal relationships are strictly prohibited.

2. SCOPE AND APPLICABILITY

1.1. Scope

This policy applies to all employees, contractors, agency workers, business partners, and suppliers within both GARO Group. Compliance with this policy is mandatory and consistent respect for all individuals, regardless of characteristics like ethnicity, cultural background, sex, gender identity, sexual orientation, religion, disability, and age, is paramount.

1.2. Definition of Discrimination

Discrimination is defined as treating an individual unfairly or in a less favorable manner based on factors unrelated to their merits, skills, or job responsibilities. This includes aspects like race, ethnicity, sex, gender identity, religion, age, disability, sexual orientation, political opinion, or union status. Discrimination can be intentional or unintentional and may occur even without intent if it results in a disadvantage to another person. Examples of discrimination include unequal pay based on gender, unwelcome sexual advances, pregnancy-based dismissal, religious refusal to cooperate, non-offering of an interview due to foreign names, refusal of access to facilities due to disability without implementing reasonable accessibility measures.

1.3. Definition of Harassment

Harassment, a specific form of discrimination, is strictly prohibited within both organizations. It involves improper behavior, unwelcome advances, requests, and any physical, verbal, or non-verbal misconduct that relates to characteristics like race, ethnicity, sex, gender identity, religion, age, disability, sexual orientation, political opinion, or union status. Harassment can take various forms, such as insults, physical threats, unsubstantiated complaints, interference with personal workspace, offensive material display, exclusion from work communication, and intrusion into personal life. Sexual harassment includes unwelcome sexual advances, requests, and misconduct.

1.4. Victimization

Victimization consists of offensive acts directed towards one or more individuals that do not need to relate to specific characteristics. Acts like excessive workload, bullying, defamation, violence, or other offensive behaviors can cause severe illness and lead to employees feeling marginalized. Both organizations are dedicated to creating inclusive workplaces and strictly prohibit victimization.

3. REPORTING INCIDENTS

Any employee experiencing discrimination or harassment is encouraged to report the incident as soon as possible to the respective Human Resources department at their site. If there is a threat or danger, the local



police should also be notified. If site HR management is involved, global Group HR should be contacted directly. Victims have the preference for interpretation, and any action taken is treated seriously. Victims may request external aid, including counseling, medical assistance, or police involvement if needed. Witnesses may be involved in the investigation if requested by the victim. Reporting discrimination or harassment should be free from threat of reprisals from management.

4. GRIEVANCE CHANNELS

Both organizations encourage employees to report harassment and discrimination directly to their site HR or to global HR. The Whistleblowing Tool should be used for ethical misbehavior like bribery, corruption, and senior management misusing their status, except in cases concerning senior employees and serious discrimination or harassment issues.

5. IMPLEMENTATION AND COMPLIANCE

The policy is a framework document designed to guide behavior and is not legally binding. The intention is to continually map cases of discrimination and harassment. All employees are responsible for keeping themselves updated on changes and additions to all policies.

6. EMPLOYEE AND MANAGER RESPONSIBILITY

Employees and managers are responsible for acting honestly and ethically. This policy provides guidance on ethical behavior, and all employees should discuss any concerns with their manager or local HR department.

7. OUR COMMITMENT TO PREVENT RETALIATION

Retaliation against those reporting a concern or suspected violation is strictly prohibited. The organizations are committed to upholding ethical values and integrity and encourage individuals to report concerns without fear of retaliation. Any employee engaging in retaliation will face disciplinary action.

This joint policy reflects the commitment of GARO Group to create and maintain respectful, inclusive, and discrimination-free workplaces, prioritizing the dignity and well-being of all individuals involved in the organizations.

8. REVIEW, VIOLATION AND CONTACT INFORMATION

This policy will be subject to an annual review conducted by the Sustainability Committee, which will ensure that it aligns with our sustainability initiatives, evolving regulations and best practices.

Any violation of this policy will be handled by your leader and the HR-department. Serious or repeated violations may result in your employment with the company being terminated.

If you have any questions or comments about this document or the sustainability efforts of GARO Group, please don't hesitate to contact our Sustainability Manager, Andreas Olsson, at andreas.olsson@garo.se or call +46 370 332 800.