



GARO GROUP

Forced Labour Policy and Action Plan

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

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Issued by Andreas Olsson, Sustainability Manager

Approved by Joseph Ree, CEO GARO Group



1. INTRODUCTION

GARO Group develops, manufactures and supplies innovative products and solutions for the electrical installations industry under its own brand, within the Business areas E-mobility and Electrification. We are committed to work for a sustainable future. GARO Group strictly condemns and prohibits all forms of modern-day slavery, including forced, bonded, compulsory, illegal prison labour and human trafficking as stated in our Code of Conduct.

All forms of forced labour, child labour, slavery and human trafficking are included in our minimum requirements as “zero tolerance”.

2. SCOPE

In the supply chain, risks of forced labour are most prominent upstream of the supply chain, often linked to specific raw materials and processes. But also, by workers who contract with labour brokers or other third-party entities to gain employment in a foreign country or another region within a country. There are indications that most forced labour violations in recent years have been related to mandatory overtime work.

When receiving information or allegation of forced labour, slavery or human trafficking the following procedure should be followed:

1. Communicate with the person/organisation which reported the issue. If the findings are credible put the factory on stop list.
2. Review the information with relevant local law to understand the key gaps and problem areas that need to be addressed.
3. Communicate with factory management and get their view and if possible, establish confirmation of the forced labour issue.
4. The Factory management will be expected to acknowledge and with the help of local NGO expert analyze the identified issues. A root cause analysis of each problem identified in the initial investigation and audit will need to be conducted and demonstrated to GARO.
5. Depending on the violation and the response from the factory, a more in-depth audit or investigation will be conducted. Either internal audit by GARO or an external audit by a 3rd party chosen by GARO.
6. This may include visiting with affected workers, factory management and any involved subcontracting parties, community leaders, local labour experts, government authorities, and NGO.
7. Inform other brands about the situation in the factory.

GARO production office responsible persons: Sustainability team and POM.

Responsible Head office: Sustainability department

3. CORRECTIVE ACTION PLAN

Once a full investigation has been conducted and the forced labour concern properly confirmed and understood, GARO will approach factory management and begin the corrective action process.



- A formal remediation letter would be sent requiring a written reply within reasonable time, stating factory management is willing to address all concerns and agrees to comply with next steps to fully remediate the situation.
- When the root cause to the situation has been established and agreed on between GARO and the factory, a corrective action plan with timelines will be agreed on between the parties.
- GARO will monitor and follow up on the corrective action plan.
- In case of confirmed human trafficking, slavery and/or any form of forced labour GARO would work with international and local expert organizations and authorities to ensure the worker is offered safe surroundings and provided with financial assistance as well as other support.
- Report to proper authorities.
- The costs of victim reparations, audits and capacity building engagements is the responsibility of the factory;
- If a factory refuses to cooperate, makes little or no progress in remediation and/or demonstrates a lack of commitment and transparency GARO will not continue to work with this factory/supplier any longer.

4. REVIEW, VIOLATION AND CONTACT INFORMATION

This document 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.