

DUE DILIGENCE POLICY

GANT GROUP

VER 001 | 2024.10.|

About the policy

GANT is committed to conducting business in a responsible way and incorporating the principles of due diligence into its own operations and value chain. The purpose of this policy is to describe GANT's approach to human rights and environmental due diligence. It concludes the processes that must be in place within the company in order to meet its diligence obligations and the responsibilities within the organization.

This policy shall be reviewed and if necessary updated at least every second year, or earlier due to significant changes in the company or its value chain.

Human rights and environmental due diligence

Corporate human rights and environmental due diligence is the practice for how companies identify, prevent, mitigate and account for their adverse human rights and environmental risks and impacts.

It is a practice guided by internationally acknowledged frameworks such as UN Guiding Principles for Businesses and Human Rights and OECD Due Diligence Guidance for Responsible Business Conduct and is also a legal obligation incorporated in national laws in several countries where GANT do business.

Due diligence at GANT

At GANT we acknowledge that the decisions and actions taken within our organization and by our partners in our value chain leads to actual and potential impacts on people and to the environment. All employees and business partners have a responsibility to know and comply with any international or national law that is applicable for their work as a minimum. In addition, we take social- and environmental responsibility that goes beyond regulatory requirements in order to contribute to a more sustainable development and to stay ahead of stakeholders' expectations and our competitors.

Sustainability, CSR and Social and environmental due diligence is a thread that runs through everything we do at GANT. This means that the mitigation of social and environmental (potential and actual) impacts should take place where they occur and therefore be incorporated in the daily work of each department.

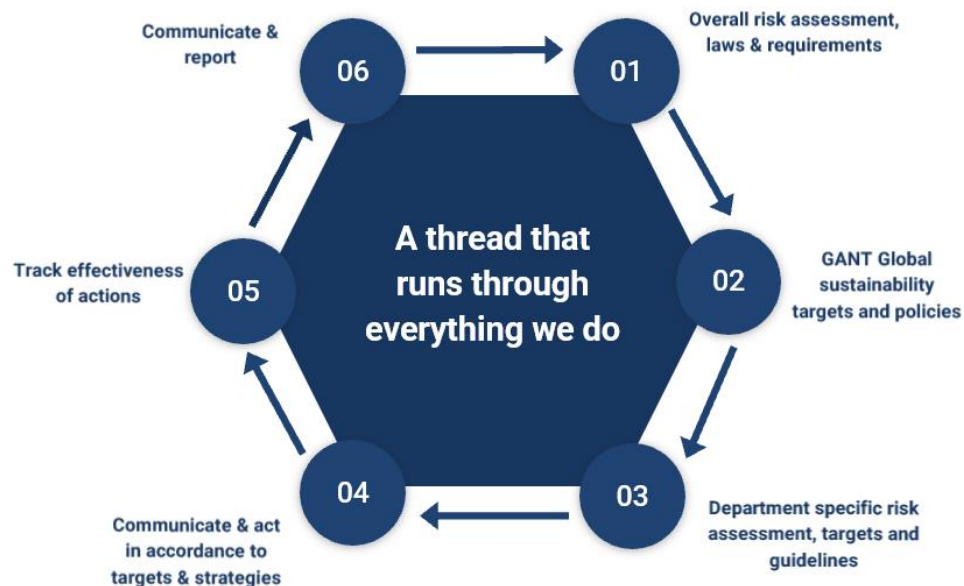
In accordance with GANT's Never Stop Learning credo, we continuously work to improve our ways of working as well as the results of our work in relation to sustainability and our human rights and due diligence obligations. In order to identify, prevent, mitigate and account for adverse risks and impacts in GANT's value chain in a systematic manner, the company shall have the following processes in place as a minimum:

- Risk assessment to identify potential and actual risks related to human- and labor rights and the environment

- Code of Conduct, targets, policies and procedures covering significant actual and potential risks
- Measures to prevent and mitigate potential adverse impacts and to bring actual impacts to an end. If they can't be brought to an end the effects should be minimized.
- Grievance mechanism
- Monitoring of the due diligence system to track its effectiveness
- Due diligence reporting

Social and Environmental due diligence is a continuous and iterative process, and a collaboration between the Global Sustainability & CSR team who is responsible for coordinating the overall due diligence process in the company and each EVP/MD who is responsible for implementing due diligence into their respective organization.

A more detailed description of this process shall be documented and available to relevant stakeholders.



Sustainability governance

Sustainability, CSR and social and environmental due diligence shall be conducted in accordance with GANT's Sustainability governance structure which defines the different roles and responsibilities within the organization.

The sustainability governance structure and responsibilities can be found in appendix 1 to this policy.

Appendix 1 – Sustainability governance

Sustainability, CSR and social and environmental due diligence shall be conducted in accordance with GANT's Sustainability governance structure which defines the different roles and responsibilities within the organization.

The board of directors:

- Annual approval the due-diligence policy
- Annual approval of the sustainability report

Global management team

- Responsible for putting into place and overseeing the due-diligence according to this policy
- Approves social and environmental targets and policies
- Reports to the board how of directors how due diligence has been carried out

Each EVP and Managing Director

- Responsible for implementing the targets and policies into their respective organization/department
- Approves guidelines and processes for social and environmental due-diligence in their respective organization/department
- Responsible for assigning Sustainability Ambassador(s) for their respective department
- Responsible for submitting department's KPI's and reporting

Sustainability Ambassadors

- Support the EVP in developing and implementing social and environmental guidelines, tools and processes
- Support EVP in submitting department's KPI's and reporting
- Member in cross-functional sustainability taskforce

Global Sustainability & CSR team

- Supports the EVP's and Management team in setting policies and targets
- Leads overall due-diligence process and monitors risks and regulations
- Supports and trains each Sustainability Ambassador to efficiently enable their work

