

Policy	
HR Policy	
Labour & Human Rights Policy	
SWEP Documentation - NOT TO BE USED OUT OF CONTEXT	
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SWEP

1. General

SWEP International AB and its affiliated entities ("SWEP" or the "Company") is a global group of companies operating in several countries around the globe. SWEP is committed to respecting and promoting internationally recognized human rights in our operations and supply chain while striving to comply with both the spirit and the letter of the law.

Respect for human rights is about treating everyone equitably and with respect and dignity. For us it is also about leading with our values and empowering people to be who they want to be.

2. Purpose

This policy aims to clarify SWEP's commitment to respect human rights, and we expect all employees to abide by the policy. Additionally, based on the human rights risk assessment driven by different teams, salient human rights risks are identified. All Divisions are expected to secure this policy within their respective organization.

3. Responsibilities

- **Policy owner: VPHR** will ensure that the Human Rights Policy is communicated and monitored and to secure available training on the policy
- **Head of Divisions & BUs:** To secure the policy in their organisations by ensuring procedures are in place to support compliance and the implementation of the policy
- **Managers** To communicate the content of the policy and implement the policy
- **All employees** (including all temporary and permanent employees) and consultants: To understand the human rights commitments in the policy and act accordingly.

This policy is reviewed at least every two years or in connection with significant changes in regulation, risk profile or operations.

4. Human Rights and Supply Chain

At SWEP we are committed to setting a high standard for our suppliers and business partners. We recognize the critical role our suppliers play with regards to the respect of the human rights across our extended supply chain. To that end the Supply Chain Division will implement procedures to assess direct and indirect suppliers and guidelines ensure we are working with companies who respect the human rights outlined in this policy.

Suppliers are expected to comply with the principles set out in this policy or equivalent standards. SWEP reserves the right to assess compliance and require corrective actions where deficiencies are identified.

5. International human rights standards

SWEP is committed to respect human rights in accordance with the International Bill of Human Rights and the International Labour Organisation's (ILO) Declaration on the Fundamental Principles and Rights at Work. In doing so, we are guided by the United Nation's Guiding Principles (UNGP) and Organisation for Economic Cooperation and Development (OECD) guidelines for multinational enterprises on business conduct and human rights.

Global Divisions within SWEP conduct human rights risk assessments or due diligence, as most relevant to them, to identify actual or potential negative impacts on human rights in our operations.

6. Validity

This policy is applicable to all SWEP employees, contractors, seasonal workers and temporary workers. The Human Rights Policy is made available to stakeholders internally and externally. Our performance and impact on human rights are communicated and reported transparently through various channels, including our external and internal websites.

This Policy is a complement to the SWEP People & Culture policy and the Dover Code of Business Conduct & Ethics, which all apply to all employees.

7. Policy Exclusions and Exceptions

Where human rights are negatively impacted, our connection to harm, significance of harm and relative context informs how we engage in remediation. We comply with national law and respect internationally recognised human rights wherever we operate. Where they are in conflict, we respect national law while seeking to honour the principles of internationally recognised human rights. We strongly believe that continuous engagement is the best way to contribute to lasting progress, and we recognise that some human rights issues across our value chain are complex and require collaboration by different parties to be addressed. If a need for exception arises for any reason, the policy owner should be contacted for further actions.

Where local law provides stronger protection than this policy, local law shall apply.

8. Human Right topics

8a. Anti-discrimination and fair treatment

SWEP is opposed to any form of direct or indirect discrimination on the basis of gender, marital status, sexual orientation, religious or political beliefs, union membership, race, colour, sex, ethnicity, nationality, citizenship, age, social background and status, physical or mental disability, military or veteran status, and any other status protected by applicable local law, and is committed to the prevention of discrimination in all areas of working life.

All employees will be treated fairly, with dignity and respect, which is the base for all employment and termination decisions, to stay objective and transparent. To avoid arbitrary decisions, controls are in place.

All employees and managers are trained to recognize and prevent harassment, abuse and other forms of intimidation or discrimination.

All forms of health screening that might result in discrimination are not tolerated (except when such health tests are mandated under local laws).

Document checks are carried out prior to commencing work to confirm that Candidates are eligible to work according to legal standards and applicable organization policies. Company does not keep or hold original documents.

8b. Freedom of Association and Collective Bargaining

SWEP recognizes the right to freely associate, or not associate with, or form a labour union or collective bargaining agreement in accordance with the law. It will be respected without fear of reprisal, intimidation, or harassment.

Dialogue between the Company and any workers' representatives acting on behalf of a legally recognized Union or Works Council shall be approached in a constructive and open manner, and bargaining undertaken in good faith.

The Company will safeguard workers representatives' ability to undertake their representative duties while in the workplace.

Where freedom of association is restricted by law, SWEP seeks alternative lawful means of employee representation.

8c. Opposition to forced or child labour and slavery

SWEP strongly condemns all forms of human trafficking and opposes all forms of labour exploitation, including child labour, forced or compulsory labour and all forms of abuse or mental or physical coercion towards our employees.

The Company shall, through legitimate means, confirm everyone's age and monitor that no individuals are hired by the Company under age 18 or under the legal age of work or compulsory schooling, whichever is higher.

Individuals under the age of 18 shall not be employed for roles that hinder schooling or educational activities, involve night shifts, or include hazardous conditions.

Under specific terms, the Company may host "work experience students" under the age of 16 as part of their schooling where this is approved by law, under oversight by the competent authorities and subject to defined legal conditions.

8d. Occupational health and safety

The health and safety of our people, contractors, and visitors is the top priority for SWEP. Company standards promote a safe and secure workplace for all employees with management systems in place to detect and manage potential risks to workers which are defined in the SWEP Health & Safety policy.

8e. Compensation and benefits

Employees' remuneration package is defined according to their job, qualifications, skills, experience and location.

Depending on the employee's location, these remuneration packages may include different pay components and benefits including but not limited to salaries, wages, overtime pay and allowances in accordance with local regulations and market practice.

Relevant benchmarks and official publications are regularly used to assess our remuneration packages and to ensure that they are in line with the labour market practice.

The Company is remunerating its employees to at least the minimum wage as defined by the local law, applicable collective agreements or in accordance with the regulations of the place of employment.

The Company shall uphold the rights of workers to freely choose employment and will not unlawfully delay or withhold pay. Deductions are not taken from pay as a disciplinary measure.

The Company will not use labour-only sub-contracting, home working agreements or apprenticeships that do not aim to teach skills or offer regular employment as a way of circumventing its obligations to employees applicable under labour and social security laws and regulations. This similarly applies to the continuous leveraging of fix-term employment contracts.

Relevant protections and benefits during pregnancy, parental and lactation, including leave and accommodations for pregnant workers, are provided in accordance with local law.

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9. Compliance and Controls

There are several control mechanisms in place to measure compliance with this policy, such as through audits, self-assessments and other internal controls. There is also a process in place where SWEP Executive Management team regularly follow up the progress of commitments, goals and ambitions covered in this policy.

10. Reporting misconduct and Anti-retaliation

The Company is committed to complying with applicable labor and employment laws in all countries where we operate. Any employee who believes a contradiction arises between the language of the policy and the laws, customs and practices of the place where he or she works should raise those questions and concerns with local management, Human Resources, the Legal and/or Compliance Departments, or via the Dover Hotline which is available to SWEP as a member of the Dover Corporation.

Workers will be familiar with how to report a grievance and have access to the Company Hotline

Grievance mechanisms are accessible, confidential and allow reporting without fear of retaliation. No form of retaliation against individuals who make reports in good faith will be tolerated.