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## CORPORATE POLICY – HUMAN RIGHTS

The Group Policy - Human Rights sets out PJCE Company's commitments to respect and support Human Rights and outlines fundamental principles to be implemented in our operations. We expect all PJCE employees to follow this policy and consistently apply its standards in all business dealings.

We will strive to fully adopt these principles in all operations in which PJCE has management control. We will endeavour to engage proactively with business partners, governments and other stakeholders to uphold the highest standards of human rights throughout the value chain.

The Human Rights Policy reflects the responsibility of PJCE to respect human rights, as set down in the UN Guiding Principles on Business and Human Rights and other international standards.

PJCE has committed to respect and promote human rights and to make sure it is not complicit in human rights abuses.

The Human Rights Policy is based on internationally-recognized human rights outlined in the following documents: International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), the principles concerning fundamental rights in the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work and, where applicable, additional standards relating to the rights of specific groups and populations. When a conflict arises between domestic regulations and these international laws, PJCE will always strive to meet the higher standard.

### Commitment and expectations

While governments bear the ultimate duty to protect human rights, PJCE recognizes its responsibility to respect and support human rights in all its business areas and operations. PJCE also endeavours to find opportunities to engage and use our leverage in our business relationships to proactively support human rights in all communities where we operate.

PJCE will strive to avoid complicity in human rights abuse and violations and will seek to provide for or cooperate in their remediation. We strive, to promote and ensure channels for transparent and open communication where all internal and external stakeholders can raise concerns without fear of retaliation or reprisal, and to provide fair investigation and grievance mechanisms. PJCE supports its employees and partners in understanding Human Rights through communication and training.

We commit to conducting human rights due diligence process to identify and manage human rights risks and opportunities in our business operations.

PJCE will commit to respecting all human rights in the scope of the international standards outlined above, however, for the purpose of this policy, we will focus on human rights that are at risk of the most severe negative impact and the most relevant to our industry and business operations, as supported by Human Rights Impact Assessments (HRIA) carried out in PJCE.

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### Children's rights

PJCE commits to recognizing, respect and support children's rights, based on the UN Global Compact Children's Rights and Business Principles. We employ zero tolerance towards child labour, abuse and exploitation throughout our operations and value chain and seek to ensure adequate remediation insofar as such maltreatment is discovered. As a service and repair company, we recognize our obligation to protect children and we recognize our obligation to empower children and their parents and caretakers according to children's rights, as they are outlined in the Global Compact Children's Rights and Business Principles.

We also recognize our obligation to protect children from harm and hence do our utmost to advance our processes and employees to be able to secure this obligation of ours through various tailor-made monitoring mechanisms.

### BREACHES AGAINST THE POLICY

Any PJCE employee who suspects violations of this Group Policy must speak up and raise the issue to their line manager and CEO. Direct access is ensured via employee's handbook available and given to each employee upon accepting a job with PJCE

### PURPOSE

The purpose of the Human Rights Policy is to outline PJCE's commitment to respect and support the Human Rights of all people affected by our business throughout societies where we operate.

The policy sets out PJCE's endeavour to engage proactively with business partners, governments and other stakeholders to uphold the highest standards of human rights throughout the value chain.

### SCOPE

This Group Policy relates to Human Rights and applies to PJ Circular Engineering A/S, its Subsidiaries as their own binding policy. PJCE also works towards making sure that the Group Policy's principles are followed in all other operations in which PJCE has an ownership interest.

This Group Policy is part of PJCE's management system

### ROLES AND RESPONSIBILITIES

Each Executive Vice President, Senior Vice President and Vice President reporting to the CEO of PJCE is responsible for ensuring that this Group Policy is duly communicated and implemented and that the employees within his/her area of responsibility are familiar with and follow this Group Policy.

All PJCE employees are individually responsible for reading, understanding and following this Group Policy.

Violations against the Group Policy can lead to disciplinary action, up to and including termination.

Name of company: PJ Circular Engineering A/S  
 Authorized Signatory: Anne-Mette Elsborg, Group CEO  
 Date: September 16th, 2020  
 Place (where signed): Copenhagen, Denmark  
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