

Labour and Human Rights Policy

Scope

- I This policy applies to all Yondr businesses and departments globally, including all corporate office locations, lines of business, shared services and operational business units.
- This policy specifically addresses Yondr's commitment to promoting human rights on a global scale.

For more detail on Yondr's approach to specific human rights, see the policies listed below:

- I Equality, Diversity and Inclusion Policy
- Supply Chain Code of Conduct
- / Health & Safety Policy

Our Commitment

Yondr is committed to respecting international human rights standards, as defined by the UN Guiding Principles on Business and Human Rights which include the UN Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

Yondr will periodically review where company activities could negatively impact human rights, identify preventative and mitigating strategies and embed best practises into our global culture as an ongoing commitment to our Yondr Values and to being a responsible business. Upholding human rights standards within Yondr and striving to maintain these standards in our supply chain is a continuous process and we will constantly strive to improve our ability to manage risks concerning human rights.

Yondr is required to abide by applicable local laws and regulations in the jurisdictions in which it operates. Where there is a conflict between domestic law and international human rights standards, Yondr will undertake comprehensive human rights due diligence to identify actual or potential human rights impacts; and actions to address these impacts. Yondr will strive to identify and adopt a suitable approach, or combination of approaches, by which the company can honour the principles of internationally recognised human rights whilst adhering to domestic legal requirements.

Modern-day slavery

Yondr has a zero-tolerance approach to all forms of modern-day slavery and human trafficking.

A person is considered to be in slavery if they are:

- Forced to work through mental or physical threat;
- Owned or controlled by an 'employer' usually through mental or physical abuse or the threat of abuse;
- De-humanised and treated as a commodity or bought and sold as 'property'; and/or



 Physically constrained or otherwise restricted from free movement against their will or with the constrainer's knowledge and intent to enslave or traffic.

Types of modern-day slavery include (but are not limited to):

- **Forced labour** a person coerced to work under a threat of some sort of punishment either to themselves or to friends/ family
- Indentured or bonded labour- work provided to repay a debt (which is often based on travel, visas/ permits, or accommodation)
- Sexual exploitation a person subject to sexual abuse and/or forced prostitution (forced marriage may also apply)
- / Domestic servitude a person obliged to provide services imposed by coercion, often within the home
- / Human trafficking a person arranges or facilitates the travel of another person into or within a situation of exploitation

We are committed to ensuring that modern slavery is not taking place within any of our business relationships and to implementing and enforcing effective systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standard.

Yondr will cooperate with law enforcement authorities to address any such instances that come to the attention of the company. Any concerns or issues related to slavery must be promptly reported using the speak-up policy. Where suppliers are not complicit in wrongdoing, Yondr will work with organistations to support corrective actions and improvements to processes.

Child Labour

Yondr refers to child labour as defined by the <u>International Labour Organisation's definition of</u> child labour.

Yondr has a zero-tolerance policy to all forms of child labour and does not and will not knowingly utilise suppliers who use child labour in our supply chain.

Yondr's requirements

- No person will be employed at any age younger than 16, or younger than the national age of completing compulsory education (whichever is older)
- / Yondr supports the development of legitimate workplace apprenticeship/ traineeship programs for people over the age of 16. In this case, suppliers must comply with all laws and regulations applicable to such apprenticeship programs
- Yondr supports short-term unpaid work experience opportunities for young people, provided it is an activity approved by the young person's school and legal guardian(s).
- Any person employed below the age of 18 must not work more than 8 hours a day or 40 hours per week or at night between 10 pm and 6 am
- No person under the age of 18 will be employed to conduct hazardous work, for example, (including, but not limited to) working from heights, unguarded or moving machinery, or where there is a high risk of electrical hazards
- Suppliers must observe all legal requirements for the work of authorised minors, particularly those relating to hours of work, wages, minimum education, and working conditions



We expect that suppliers hold their own suppliers to the same standards and highlight this in our supplier code of conduct.

Freedom of Association and right of collective bargaining

Yondr respects the rights of employees to freedom of association and collective bargaining

Review and investigation of human rights violations:

Should human rights violations be discovered within our supply chain, Yondr will work with the supplier to remediate the issue and eliminate any associated bad practice completely, in a sustainable and preventative way that includes regular monitoring and follow up to ensure no recurrence of the issue. In instances where suppliers fail to respond to corrective actions or consistently fall short of expectations contract termination will be considered.

In suspected cases of modern slavery and child labour, Yondr will review the case to understand the circumstances using our partner consultancy, Slave-Free Alliance. Local law and international guidelines will be consulted in all circumstances to determine the best course of action for the specific incident. Together Yondr and the Slave-Free Alliance will work together to determine the next steps.

Dave Newitt

Chief Executive Officer

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