Atea ASA

Human Rights Policy

At Atea, we recognize that upholding and promoting human rights is not only a moral imperative but also essential for achieving our long-term mission of building the future with IT.

This policy complements Atea's Code of Conduct, Supplier Code of Conduct, and other policies ensuring responsible business practices and respect for human rights in all operations, business relationships, and interactions with customers and other stakeholders. The policies are reviewed regularly and updated if needed.

Scope

The policy applies to all Atea Group's entities and employees, who must adhere to it in all business activities. We expect our business partners to share our commitment to respecting and safeguarding human rights.

Respect for Human Rights and Compliance with International Standards

We recognize the inherent dignity and worth of all individuals. We respect the rights enshrined in the Universal Declaration on Human Rights through our commitment to adhere to the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Atea operates out of countries that have ratified the ILO Fundamental Conventions related to freedom of association, the effective recognition of the right to collective bargaining, the elimination of all forms of forced labor, the effective abolition of child labor, and the elimination of discrimination in respect of employment and occupation. We also adhere to the United Nations Convention against Transnational Organized Crime including the protocol on the prevention of human trafficking.

We are also committed to ensuring that our business activities do not, directly or indirectly, further conflict financing. Furthermore, Atea is dedicated to providing a secure, safe, and healthy work environment for all employees. We uphold these standards in our operations and expect our business partners to do the same.

Responsible Business Conduct

We are committed to apply the UNGPs across our operations and value chains. Our management systems and due diligence processes are implemented to identify, prevent, mitigate, and account for any adverse human rights impacts caused or contributed to by our activities, or which may be directly linked to us through business relationships. Atea expects business partners to actively work in line with the UNGPs in their value chains, and will act accordingly if partners fail to meet these standards.

Atea aims to operate in a transparent and ethical manner, work to prevent corruption and bribery in any forms. We comply with national laws and regulations in all the markets where we operate, and we actively oversee and evaluate our business activities to ensure adherence to relevant international laws and regulations, including trade sanctions and dual-use goods. In cases where there are conflicts between internationally recognized human rights and local laws, the company follows procedures aimed at upholding the principles of international human rights.



Continuous Improvement

At Atea, we strive to continuously improve our human rights performance. Our commitment to accountability is reinforced by clear management, training of key personnel and up-to-date policies and processes. Where we recognize our responsibility for adverse human rights impacts, we take steps to remediate them, either independently or in collaboration with other stakeholders. We commit to track and evaluate our impact, and transparently communicate our initiatives through reports and ongoing engagement with stakeholders.

We actively use our leverage to promote human rights by engaging in dialogues with a diverse range of stakeholders, fostering transparency, and driving positive changes. As members of the United Nations Global Compact and the Responsible Business Alliance, we cooperate with other industry actors to advance social, environmental, and ethical responsibility throughout our value chains.

Contact

You can read more about Atea's sustainability work on our ESG website.

We acknowledge that there are many knowledgeable organizations that can assist us in understanding the risks and dynamics of our value chain. If you would like to share information with us or request further details, please contact us at responsiblesourcing@atea.se. The information provided will be treated as confidential.

Alternatively, you can submit a concern anonymously on our <u>Whistleblower Hotline</u>. Reports submitted to the Whistleblower Hotline are handled confidentially by an outside law firm engaged by Atea on behalf of the Board of Directors.

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