

# Human Rights Policy



## **Our Responsibility**

At Matas Group we recognize our responsibility to operate with respect to human rights. We believe that everyone deserves to be treated equally, and with respect and dignity. In our opinion respecting human rights is also about leading with our values and empowering people to be proud of who they are.

We are both committed to operating with respect to human rights in our own operations and across our value chain. This commitment is set out in this Human Rights Policy and applies to all entities within Matas Group. This policy provides an overview of key priorities and stakeholders and how we implement human rights in our organization.

## **Our Approach**

Our approach is based on the following guiding principles:

- The OECD's guidance for multinational enterprises
- The UN Guiding Principles on Businesses and Human Rights
- The ILO Declaration on Fundamental Principles and Rights at Work, and
- The International Human Rights Convention

## **Our Human Rights Commitment**

Based on the above guiding principles our policy holds our commitments and guidelines regarding the following elements ("**our Human Rights Commitment**"):

### **1. Respect for Human Rights**

Matas Group is committed to uphold and respect human rights, as further described in our Human Rights Commitment.

### **2. Anti-corruption and bribery**

Matas Group is committed to comply with all applicable laws and actively fight against corruption in all forms. Matas Group' policies state that no employee or supplier may receive or solicit services, gifts, or payments that could be interpreted as an attempt to obtain benefits for themselves or Matas Group. Any violation of these policies will result in serious disciplinary measures against the implicated party.

### **3. Freedom of association and the effective recognition of the right to collective bargaining**

Matas Group respects the rights of our employees to form worker's councils, join a labor union or other employee representations and to enter into collective pay agreements in accordance with national laws and regulations.

### **4. Elimination of all forms of forced or compulsory labor and exploitation of child labor**

Matas Group works actively to ensure that we refrain from all forms of forced labor, slavery, and human trafficking within our organization. We have implemented procedures to ensure that children are always protected from all forms of work that puts their health, schooling and/or development at risk. All our fulltime employees must be at least 15 years

of age. We do not take on employees under the age of 18 for tasks involving hazardous work that could harm the employee's physical or mental health or safety.

## **5. Elimination of discrimination in respect of employment and occupation**

Matas Group works to create an inclusive culture that values employees' different backgrounds, perspectives, and experiences. Matas Group supports equal opportunities for all employees and prohibits discrimination based on ethnic origin, color, gender, sexual orientation, age, disability, religion, nationality, social background, political views, and any other circumstances that could be used to discriminate, as stipulated in our [Diversity Policy](#).

Matas Group forbids any form of physical, verbal, sexual or psychological harassment, bullying or the use of threats at the workplace from other employees, including managers and colleagues.

## **6. Safe and healthy work environment.**

Creating a healthy and safe workplace is one of the most important priorities for Matas Group. With a diverse group of roles, that spans from warehouse logistics, administrative work and store front professionals, the health and safety guidelines for employees cover all roles and functions.

As per national law, Matas Group has a work environment organization in place that secures occupational health and safety at the workplace. The organization helps to ensure a healthy and good working environment across the diverse roles and departments. Matas Group has formed work environment groups that represent warehouse functions, administrative functions, and store functions. All team members have voluntarily agreed to become a part of the team and work closely and collaborative in support of a good work environment. The working environment representative is elected for a two- to four-year period and is protected by the same rules as a staff representative. All working environment representatives have completed the statutory working environment course.

## **Our Suppliers**

As a retail chain, a successful collaboration with our suppliers is fundamental to secure that we operate responsibly and in respect of our Human Rights Commitment. Our Supplier Code of Conduct sets the framework for the conduct we expect from our suppliers. Therefore, our Human Rights Commitment as defined in this policy is also mandatory for Matas Group suppliers and included as obligations in our [Supplier Code of Conduct](#).

## **Our Stakeholder Engagement**

In Matas Group we have established a Whistleblower scheme that provides a safe mechanism for engaging with stakeholders, including customers, employees, suppliers and other relations, and local communities. By filing a report in our Whistleblower scheme, our stakeholders can address concerns and promote the Groups continuous improvement. Any such report may be filed anonymously.

The system is publicly available [here](#) and is communicated to all employees on an ongoing basis.

## **Remediation Mechanism and Continuous Improvement Measures**

In the case that Matas Group uncovers any situation where we have caused or contributed to negative human rights impacts, we will adhere to the following process to as far as possible ensure appropriate remediation:

1. Assess the extent of the impact and identify affected stakeholders,
2. map the course of the negative impact, to understand the incident, and
3. initiate actions to correct the impact to minimize the risk that Matas Group is, either directly or indirectly, implicated in similar cases.

Through this process, we will engage in dialogue with the affected parties to remedy the negative impact.

We will ensure continuous improvement of this policy and supporting practices, through regular reviews that secures alignment with evolving human rights.

## **Transparency and Reporting**

Any violation of this policy is reported annually, in compliance with applicable Danish Law, through Matas Groups ESG report. Our ESG report holds information on any incidents related to our Whistleblower Scheme, anti-corruption and bribery, health and safety and breaches of human rights.

## **Policy Governance**

The operational responsibility for working with our Human Rights Commitment in Matas Group is anchored in the ESG Board of Matas Group, with the Director of ESG, HR and Communication as chairman of this board. The ESG board reports to the Executive Management on human rights issues, when identifying potential conflicts with upholding Our Human Rights Commitment set out in this policy.

The elements in our Human Rights Commitment are assessed on an annual basis by the ESG board, when conducting the Group's Double Materiality Assessment. During this assessment the board identifies potential negative impacts and risks in Matas Group's own operations and the probability and potential occurrence in the Group's value chain.

The Executive Management Team is responsible for approving and supervising compliance with Matas Group' Human Rights Policy, and the Audit Committee assesses the Policy's suitability, adequacy, and effectiveness at least annually.

This Human Rights Policy is available online. Reports of violations of this policy can be directed anonymously via [Matas Group' Whistleblower scheme here](#).

Adopted by the Executive Management Team on March 26. 2024.

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