



C.A.R. Consulting Group
Global Marine and Automotive Consultants and Surveyors

WORKING CONDITIONS & HUMAN RIGHTS

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C.A.R. Consulting Group is committed to responsible corporate practices in the area of human rights and working conditions and aligns with practices recommended by industry standards such as the Global Automotive Sustainability Practical Guidance and the [RBA Code of Conduct](#), which incorporates the International Bill of Human Rights, namely the Universal Declaration of Human Rights (1948), the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights and its two Optional Protocols (1966). C.A.R. Consulting Group also adheres to the principles set forth in the fundamental [ILO Conventions](#), namely the Forced Labor Convention (1930), the Minimum Age Convention (1973), the Worst Forms of Child Labor Convention (1999) and ILO Declaration on Fundamental Principles and Rights at Work (1998).

C.A.R. Consulting Group's human rights expectations apply to all of our personnel, business partners and other parties directly linked to our operations, products or services; as such, C.A.R. Consulting Group is committed to respecting the United Nations Guiding Principles for Business and Human Rights (2011) and its principles within our operations and supply chains. The working conditions of our employees are, at minimum, in compliance with internationally recognized labor standards and the laws of the countries we operate in. When national law directly conflicts with international human rights standards or does not fully comply with them, C.A.R. Consulting Group will seek ways to respect internationally recognized human rights, such as those enshrined in the conventions mentioned above.

No Child Labor

C.A.R. Consulting Group will not employ children below the minimum age for employment according to applicable regional law, in any case not under the age of 15. Furthermore, C.A.R. Consulting Group shall ensure that persons under the age of 18 do not perform any offshore duties or undertake any hazardous work that could jeopardize their health or safety, including night shifts and overtime. "Child labor" means any work by a child or young person, unless it is considered acceptable under the [ILO Minimum Age Convention 1973 \(C138\)](#).

C.A.R. Consulting Group supports the use of legitimate workplace learning programs that comply with all laws and regulations, provided that these laws and regulations are aligned with international standards. C.A.R. Consulting Group will ensure proper management of student workers through effective maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. In any case, appropriate support and training shall be provided to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

No Forced Labor

C.A.R. Consulting Group does not tolerate any form of forced labor, including debt bondage, indentured labor or involuntary prison, nor any involvement in human trafficking in its business activities. This includes transporting,



harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

C.A.R. Consulting Group will not unreasonably restrict workers' freedom of movement throughout company-provided facilities nor unreasonably restrict workers' entering or exiting company-provided facilities.

C.A.R. Consulting Group will engage with suppliers to eradicate modern slavery, forced labor and human trafficking in its supply chain.

Prohibition of Human Trafficking Related Activities

C.A.R. Consulting Group strictly prohibits employees, subcontractors, subcontractor employees, and agents from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.

C.A.R. Consulting Group also prohibits employees, subcontractors, subcontractor employees, and agents from engaging in practices relating to trafficking in persons, including:

- Destroying or otherwise denying access to an employee's identity or immigration documents;
- Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment;
- Using recruiters that do not comply with local labor laws;
- Charging employees recruitment fees;
- Failing to provide an employment contract or work document where required by law.

C.A.R. Consulting Group operating companies will take appropriate disciplinary action for violations of these rules, up to and including discharge of employees, subcontractors, and agents.

C.A.R. Consulting Group operating companies must cooperate fully with appropriate governmental authorities in audits or investigations relating to such violations. Employees of C.A.R. Consulting Group operating companies are required to cooperate in any internal or external investigation of suspected wrongdoing under this policy.

Working Hours, Wages & Benefits

Working hours, breaks, holidays and leave periods will be established in compliance with local laws and agreements, and in any case, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.



C.A.R. Consulting Group shall ensure that all employees are provided with written agreements of employment and are free to leave their work after giving reasonable notice.

Furthermore, compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law. Imported and migrant workers are to be provided equal wages, benefits and working conditions.

Fair employment practices

All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees have been paid by workers, such fees shall be repaid to the worker.

Health and Safety

C.A.R. Consulting Group consistently complies with applicable environmental, safety and health (ESH) regulations as well as customer, community and other requirements. C.A.R. Consulting Group furthermore commits to continual improvement of its operations, progressively reducing the potential ESH impact of its activities, by focusing on:

- the health, safety and productivity of employees and processes;
- efficient use of natural resources; and
- prevention of pollution.

Freedom of Association & Collective Bargaining

All workers have the right to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly. C.A.R. Consulting Group will respect the right of workers to refrain from such activities and respect their freedom of opinion and expression.



Additionally, workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices, both without fear of discrimination, reprisal, intimidation or harassment.

Finally, where employees participate in a strike for a lawful object, C.A.R. Consulting Group shall not interfere with, impede or diminish their right to strike, or to affect the limitations or qualifications on that right.

Non-Discrimination & Anti-Harassment

C.A.R. Consulting Group ensures equal opportunity for all without discrimination or harassment on the basis of sex, race, age, color, disability, ethnic or national origin, sexual orientation, religion, social or marital status, or other status protected by applicable law. C.A.R. Consulting Group respects employee's and business partners' freedom of thought, conscience and religion.

C.A.R. Consulting Group does not tolerate any acts of sexual harassment or other forms of discrimination or harsh treatment.

C.A.R. Consulting Group encourages all employees and business partners to report and remedy harassing workplace conduct with the goal of eliminating such conduct quickly and effectively, even in cases in which the reported conduct may not be severe and pervasive so as to constitute a violation of the law.

C.A.R. Consulting Group is committed to gender equality and believes that equal work deserves equal pay.

Contractor and Supplier Requirements

Beyond observing these requirements in its own operations, C.A.R. Consulting Group requires that its contractors, subcontractors, suppliers and their sub-suppliers adhere to the requirements of this Policy.

Suppliers that fail to adhere to these requirements may be subject to sanctions, including, but not limited to, termination of their agreements with C.A.R. Consulting Group for default.

Compliance Plan

Compliance with this Policy at C.A.R. Consulting Group facilities will be reviewed and documented by periodic internal audits.

C.A.R. Consulting Group supply chain compliance efforts will focus on direct suppliers, and their employees and contractors, all of which are required to comply with applicable laws and to acknowledge and agree to C.A.R. Consulting Group's Corporate Code of Ethics, and this Policy. C.A.R. Consulting Group will conduct periodic



audits of its suppliers. Subcontractors or suppliers that pose potentially greater risks may be subject to more detailed risk assessments and additional verification.

Non-compliance with this Policy or relevant laws and regulations may lead to sanctions or penalties, including, but not limited to, termination.

Relationship to our Corporate Code of Ethics

This Policy is intended to supplement and strengthen C.A.R. Consulting Group's commitment to human rights under its existing Corporate Code of Ethics.

To support compliance with this Policy, C.A.R. Consulting Group encourages its employees to report any concerns regarding potential violations of this Policy, or any related law or regulations, to their manager, company contact or their company's legal or human resources department.

Reports can be made without fear of retaliation.

Name : Timo David Pasila

Position : Managing Director

Date : August 30th, 2021

Review Date : September 15th, 2021

Signature :