

Stockholm, April 15, 2026

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# *Pandox's Fair Play* Human Rights Policy

Document information	
<b>Decided by</b>	The Board of Directors of Pandox AB (publ)
<b>Date of decision</b>	2026-04-15
<b>Document Creator</b>	SvP, Director of Sustainable business
<b>Document Owner</b>	SvP, Director of Sustainable business
<b>Last updated</b>	2026-04-15

## Purpose and ambition

Pandox is committed to respecting and promoting human rights throughout its operations, including the value chain and in the communities in which it operates. This means that Pandox always strives to promote the realisation of internationally recognised human rights and strives not to cause, contribute to or be associated with negative impacts on human rights.

In accordance with the principles of the UN Global Compact and the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises, Pandox undertakes to respect as a minimum the human rights expressed in the International Bill of Human Rights and in the ILO's core conventions.

## Scope and responsibilities

This human rights policy applies to all employees regardless of their form of employment, business partners, suppliers and subcontractors. Pandox expects all business partners, suppliers and subcontractors to work proactively and systematically to ensure that they respect and promote human rights in accordance with this policy. Pandox expects them to develop due diligence policies and processes to live up to their responsibility to respect human rights in their own operations and value chain. Pandox expects business partners, suppliers and subcontractors to also undertake to provide or cooperate to compensate for adverse human rights impacts, and to develop an effective complaints mechanism to enable redress.

This human rights policy is supplemented by Pandox's Code of Conduct for Employees, the Code of Conduct for Business Partners and the company's statements in accordance with the UK Modern Slavery Act and the Norwegian Transparency Act. These contain more detailed information about Pandox's rules of conduct and expectations in the field of human rights.

Pandox's Senior Vice President Director of Sustainable Business is responsible for the content of the policy, any necessary updates to it, and together with the respective manager, its implementation in the organisation and the overall responsibility for taking appropriate measures to identify, prevent and mitigate actual or potential negative impacts on human rights. The policy is adopted annually by Pandox's Board of Directors and is available on the company's website.

## Pandox's risks and impact on human rights

As a hotel operator and property manager, the biggest risks are related to the personal integrity of our guests and employees as well as the risk of human trafficking or prostitution on the company's premises.

In the supply chain, the main risks, with respect to human rights, are mainly found among actors in the extraction of raw materials and the processing and manufacture of products. However, these are far from Pandox's core business. In the case of service providers and subcontractors, however, the risks are closer to the core business. In Property Management, the main risk is illegal labor and wage dumping in renovations, reconstructions or extensions.

Within Operator Activities, there are risks linked to trafficking and prostitution that can take place on the hotel's premises. Furthermore, there is a risk of exploitation of migrant workers in cleaning and restaurants as the risk of lack of awareness of their own rights and employment conditions is great due to a lack of language skills in English and the local language.

## Human rights due diligence

In order to fulfil our commitment to respect and uphold human rights, Padox will continuously improve our processes for identifying, preventing and limiting negative impacts on human rights. We do this by:

- Continuously identify impacts on human rights, including by consulting with potentially affected individuals or other relevant stakeholders. We take into account that risks to human rights can change over time.
- Integrate identified actions from the human rights impact analysis carried out in 2025 and which are complementary to the impact analysis carried out in 2022.
- Follow up on how effectively we manage and respond to actual or potential negative impacts on human rights.
- Regularly develop and carry out audits of Padox's suppliers via Padox's supplier review system.

## Guidelines

### *Sexual exploitation, prostitution and trafficking*

Padox has zero tolerance for crime or any form of sexual exploitation, prostitution and trafficking. Any suspicion of such activities must be reported immediately to the hotel management. Padox cooperates with the police and local authorities to prevent crime.

### *Child labour and forced labour*

Padox does not tolerate any form of child labour and respects internationally recognised human rights, including the ILO's core conventions. The minimum age for work shall be in line with national law and shall not be lower than the age at which compulsory education is completed.

All work must be carried out voluntarily. No form of forced labor or work linked to any form of threat or punishment is allowed, and employees have the right to terminate their employment with a reasonable period of notice.

### *Fair and equal treatment*

All Padox's employees shall be treated with respect and dignity, be covered by equal rights and opportunities, and shall not be discriminated against regardless of gender, transgender identity or expression, ethnicity, nationality, religion or other belief, disability, medical status, sexual orientation, age, parental status, marital status, trade union membership or political opinion, and all relevant grounds for discrimination under national discrimination laws in the countries in which Padox operates. However, employees are not allowed to take a political position in Padox's name. No forms of psychological, physical, sexual or verbal abuse, intimidation, threats or harassment will be tolerated.

### *Privacy, privacy and information security*

Padox respects the right of the company's employees, business partners, tenants and guests to privacy and data protection under the General Data Protection Regulation (GDPR), local laws and Padox's Personal Data Policy. Padox ensures the confidentiality of personal data obtained from business partners, tenants or hotel guests. Under no circumstances may such information be disclosed or discussed for any purpose other than the performance of the duties in question. External disclosure of customer information is strictly prohibited, except when Padox has a responsibility under law or government regulations.

## *Access to water and sanitation*

Pandox recognises the importance of access to clean water and sanitation as fundamental human rights. The company is committed to ensuring that all employees and guests have access to safe and clean drinking water as well as adequate sanitation facilities.

## Management of Pandox's risks and impact on human rights

Pandox intends to identify, evaluate and manage its negative impact on human rights through the policies and procedures that govern its operations.

In practice, this means that:

- Pandox, as a signatory to the UN Global Compact, has committed to working in accordance with its ten principles, and integrating them into strategies, policies and processes.
- Respect for human rights is incorporated into daily operations through the Code of Conduct for Employees, the Code of Conduct for Business Partners, and Pandox's statement in accordance with the UK Modern Slavery Act and the Norwegian Transparency Act, as well as through this Human Rights Policy.
- Employees are trained in the content of Pandox's Code of Conduct for Employees and the complaints mechanism. The training is available in seven languages.
- Pandox ensures that information about the complaint mechanism is also available in staff rooms in relevant languages.
- Pandox's ambition is that new employees in restaurants and cleaning will receive their contracts in their home language.
- Based on Pandox's operations and geographical presence, the risk of child labour in its own operations is assessed as low. Pandox operates in markets with a high degree of regulation and supervision and does not sell its own products, which limits its exposure to this risk. However, there may be a risk of child labour at the supply chain, mainly when purchasing products and services. To manage this risk, Pandox applies a supplier audit and requires suppliers and subcontractors to respect fundamental human rights, including the prohibition of child labour, in accordance with Pandox's Code of Conduct and relevant policies.
- Pandox does not tolerate harassment, discrimination, abusive treatment or bullying. All employees at Pandox have a responsibility to be observant of and report incidents of discrimination, including harassment, abusive treatment and bullying, regardless of department or position.
- Pandox does not allow discrimination and the company works for equal pay for equal work.
- Pandox requires suppliers and subcontractors to comply with the Code of Conduct for Business Partners. In property management, it is a requirement to digitally review new and returning suppliers above a significantly set amount before ordering. The purpose of the review is for Pandox to follow up that suppliers comply with the Code of Conduct for Business Partners, which contains specific requirements relating to human rights. If a deviation from the Code is identified, the business partner shall provide an action plan to be approved by Pandox. Pandox reserves the right to make plastic visits and terminate the agreement with the business partner in the event of a material breach of the obligations described in the Code, the underlying conventions and declarations.
- Pandox works proactively to minimise the risk of human trafficking and/or prostitution at its hotels within Own Operations and annually publishes a statement in accordance with the UK Modern Slavery Act in which developments and relevant key activities are communicated.
- Hotels within Own Operations report annually whether there have been incidents in human trafficking or prostitution, discrimination, sexual harassment and how this has been handled. The occurrence and management of these are publicly reported in the company's sustainability report.
- Pandox ensures access to a whistleblower system where internal and external stakeholders can report misconduct or other irregularities, including anonymous reporting.
- Pandox works with set goals in the areas of inclusion and diversity and equal treatment without

discrimination regardless of gender. Padox continuously monitors and, as part of the annual sustainability report, reports specific key figures related to human rights, such as incidents that have occurred, supplier audits and their outcomes, and the number of whistleblower cases.

- Padox's ambition is to introduce and align its due diligence process with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. This covers all of Padox's operations, including the supply chain.

### *Redress measures*

Padox has undertaken to provide or cooperate to compensate for any adverse human rights impacts that Padox has caused or contributed to. All stakeholders can use Padox's whistleblower function to raise the alarm about actual or potential negative impacts on human rights.

### Follow-up and compliance

If serious violations of the guidelines in this policy are discovered, internal and external stakeholders can report this to Padox.

Employees should primarily report the incident to their immediate manager. If this is not possible, the immediate superior's superior shall be informed in accordance with the grandfather principle. Incidents or suspected incidents can also be reported via Padox's whistleblower function. In this case, the reporter can choose to remain anonymous. The whistleblower function is provided by an external party to ensure objectivity and anonymity. It is also possible to report on HR matters anonymously in the Whistleblower system. These are then handled by each hotel's HR manager. See Padox's Guidelines for whistleblowing. The guidelines and the link to the whistleblower service are available on Padox's website.

Reporting of any violations of the policy will be treated confidentially and investigated appropriately. Padox will ensure that persons who report possible violations in good faith will not be subjected to retaliation by Padox as a result of their reporting.

Any violations of this policy are dealt with on a case-by-case basis and assessed on the nature, scope and potential impact of the violation. Padox takes proportionate measures and undertakes to ensure that deviations are prevented in the future. For business partners and suppliers, deviations may also require immediate improvement measures or reassessment of the collaboration.

For more information about Padox's sustainability work, see [www.padox.se/sv/hallbarhet](http://www.padox.se/sv/hallbarhet)