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Pandox Fair Play

Report in accordance with the Modern Slavery Act

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Introduction

This report is submitted by Pandox AB (publ.) with respect to the financial year 2025. This is Pandox's eighth report in accordance with section 54(1) of the Modern Slavery Act of 2015. The report contains a description of Pandox's policies to identify and mitigate the potential risks of modern slavery in its business operations and supply chain.

Pandox's supply chain

Pandox is an international hotel property company, whose operations are organised into two business segments: Lease agreements and Own operations. Leases consist of hotel properties that are leased on a long-term basis to market-leading hotel operators who are responsible for operations. Pandox's own operations consist of hotel properties whose operations are carried out by Pandox itself via franchise or management agreements, or via independent brands. Pandox's activities therefore span the entire hotel value chain, which entails a large number of suppliers.

There are two types of suppliers in Pandox's operations: manufacturing and service providers. Risks with regard to human rights and labour rights for manufacturers are mainly found in the extraction of raw materials and the processing and manufacture of the products, and are therefore remote from Pandox's core business. In the case of service providers, however, the risks are found closer to the core business and are identified in both Lease agreements and Own operations. In Lease Agreements, the main risk is illegal labor and wage dumping in renovation, remodeling or extension.

Within Own Operations, there are risks linked to trafficking and prostitution, which can take place on the premises within the hotel operations. Furthermore, there is a risk of exploitation of migrant workers in cleaning and restaurants. Preventive measures are described below.

Pandox's policies and associated processes

Pandox has zero tolerance for all forms of modern slavery, exploitation or work under slavery-like conditions, as well as forced or child labour. Pandox strives to conduct its business in accordance with international initiatives and sustainability standards, including the UN Global Compact, the International Labour Organization's (ILO) core conventions, the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.. Pandox joined the UN Global Compact in 2019, which means that the company has committed to working in accordance with the ten principles in areas such as human rights, labour law, the environment and anti-corruption. Pandox's Sustainability Report 2025 is the company's eighth Communication on Progress Report. 2025 is the second year that Pandox's sustainability report complies with the EU's Corporate Sustainability Reporting Directive (CSRD), and the first year that Pandox is legally covered by the directive. Reporting under the CSRD is relevant as it ensures that our sustainability information is transparent, comparable and of high quality, as well as addressing risks related to human rights.

Pandox's Code of Conduct for Employees and Code of Conduct for Business Partners are based on the ten principles of the UN Global Compact and the ILO's Declaration on Fundamental Principles and Rights at Work. These policies form the basis for Pandox's work with human rights and labour law.

Pandox ensures that all employees have knowledge of the content of the code for employees through a web-digital training course that is available in seven languages. In the event of major updates to the policy, all employees must go through the training again. The goal is for all employees to complete the training.

The Code of Conduct for Business Partners describes the expectations that Pandox has of its business partners with regard to human rights, labour law, the environment and anti-corruption. The Code of Conduct for Business Partners is part of all new agreements. All new suppliers in Sweden above a certain amount undergo a digital review via an external tool. First, it is verified that the company exists and is active, then the company is screened against global sanction lists. If the audit yields abnormal results, the procurement will be cancelled. For approved suppliers, a risk analysis is carried out in the system based on risk parameters such as industry, country, size of annual purchases and contract length. Medium- and high-risk companies are asked to respond to a digital self-assessment questionnaire to provide Pandox with a better basis for decision-making in the final stage of the procurement. When deviations are discovered in the self-assessment forms, a dialogue is initiated with the supplier where they can come up with proposals for an action plan. Pandox approves the plan and then follows up that the decided measures are implemented within the set time. Suppliers who do not rectify identified deviations will be subject to site visits and, depending on the severity, may have their contracts terminated.

Furthermore, Pandox has undertaken to provide or cooperate to compensate for any adverse human rights impacts that Pandox has caused or contributed to. All stakeholders can use Pandox's anonymous whistleblower function to raise the alarm about actual or potential negative impacts on human rights. The reporting mechanism is provided by an external party to ensure objectivity and anonymity. The whistleblower function is available on Pandox's website. Pandox has also ensured that information about the complaint mechanism is clearer on the website.

Work in 2025

The work during the year was based partly on the impact assessment carried out in 2022 and partly on an updated analysis carried out in 2025, both by an independent third party. The Impact Analysis is used as a tool to identify, assess and report on human rights risks both in the supply chain and Pandox's own organisation, as well as the measures that need to be taken to manage these risks. The purpose of the updated analysis was to supplement and deepen the previous assessment and to ensure that identified risks and prioritised measures continue to reflect current operating conditions and changes in Pandox's supply chain. The updated analysis confirms previous risk areas and includes the industries and countries that continue to be considered to have a higher risk of impact on human rights.

As part of the process to ensure that all employees have taken part in Pandox's Code of Conduct for Employees, the level of performance within Pandox's Own Operations continued in 2025, with the aim that all employees will complete the training. In 2025, the implementation rate was 79 (71) percent, which is slightly higher than the previous year.

In 2025, work continued to strengthen Pandox's governing documents and internal processes to ensure a good due diligence process and further development of Pandox's process for supplier audits. In 2025, an updated and comprehensive spend analysis was also carried out with the aim of

identifying all suppliers in Pandox's operations. The analysis takes place over a rolling twelve-month period and, as in previous years, is carried out in collaboration with an independent third party. The construction industry is the industry identified as having the highest risk for Pandox. Of Pandox's total of about 5,000 suppliers, around ten per cent are attributable to the construction industry. During the period September 2024 to August 2025, Pandox conducted supplier audits of a total of 2166 (2206) suppliers, which corresponds to approximately 42 per cent of the total supplier base and 72 per cent of spend. Of these, 2112 suppliers were approved, while the rest were handled through in-depth investigations, site visits or red listing. In 2025, a total of 108 (154) suppliers were audited and, based on the risk assessment, were identified as high-risk suppliers and thus followed up through in-depth questionnaires. The most common reason for a red risk assessment during the year was a lack of answers to self-assessment questionnaires or follow-up questions.

In 2025, site visits were carried out at two suppliers with a red risk profile to follow up on the work environment, safety and regulatory compliance. The visits mainly identified shortcomings in administrative procedures and the systematic work environment management. Pandox follows up the action plans on an ongoing basis to ensure that the requirements are met. In 2025, three cases were submitted via Pandox's whistleblower channel that were classified as whistleblower cases, one of which led to dismissal. No cases of human rights violations have been reported. 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. During the year, no cases of prostitution or human trafficking were reported in Egen drift. The occurrence and management of these are publicly reported in the company's sustainability report.

In 2025, Pandox continued to strengthen its work on inclusive and equal recruitment. HR teams and hiring managers participated in a workshop on inclusive recruitment practices, and additional training efforts were conducted locally at several hotels, including on unconscious bias and diversity issues.

The work against prostitution and human trafficking has continued to develop. During the year, more employees were trained in identifying and reporting suspicious situations, especially those with direct guest contact. The training was carried out by 1,505 (954) employees. Going forward

In 2026, Pandox will take measures to further improve its performance in human rights and labour law by:

- Continue to ensure that the Code of Conduct for Business Partners is part of all new agreements.
- Ensure that all employees complete the digital training on the Code of Conduct for Employees. The goal is for everyone to complete this.
- All of the suppliers where serious deviations have been identified through the self-assessment form and where deviations could not be rectified shall be further reviewed through on-site inspections carried out by an independent external party.
- Strengthen the vendor review process with a system administrator.
- Further develop internal processes to ensure that effective and effective redress is implemented in situations where adverse human rights impacts have been identified.



- Strengthen engagement and dialogue with suppliers to ensure compliance with human rights as set out in the Code of Conduct for Business Partners.
- Strengthen and develop stakeholder dialogue as part of the evaluation process, as well as actively work to capture perspectives from vulnerable groups.
- Raise awareness of discrimination and harassment in the workplace.

For more information about Pandox's sustainability work, see www.pandox.se/sv/hallbarhet