

# Responsible Recruitment Policy

## Purpose

At Espersen, we are committed to recruiting employees with the business ethics and integrity outlined in Espersen’s Code of Conduct. We recognize the gravity of modern slavery and human trafficking and acknowledge our responsibility to take action to prevent these practices within our recruitment process and operations. This Responsible Recruitment Policy outlines our commitment to combatting modern slavery and human trafficking as well as our approach to ensuring that all aspects of the Company’s own recruitment and recruitment through 3<sup>rd</sup> parties, are free from forced labor practices.

## Definition

The policy applies to all employees, contractors, suppliers, sub suppliers and business partners of the Company, with regards to recruitment. For the purpose of this policy, 'human trafficking' means the recruitment, transportation, transfer or receipt of persons, using threat or other forms of coercion, for the purpose of exploitation.

## Policy

Espersen prohibits all forms of human trafficking within its operations and supply chains. We are committed to upholding fundamental human rights, and we expect the same commitment from our employees, suppliers, contractors and business partners. We will not knowingly engage with any individual or entity involved in human trafficking.

Espersen commits to adhering to all applicable legal regulations concerning the prevention of human trafficking. All workforce suppliers and business partners in the area of recruitment are assessed and monitored for compliance with our Responsible Recruitment policy.

Supplier verification procedures includes audits and contract reviews. Employees are trained to recognize signs of human trafficking and to report suspicions in accordance with internal procedures.

The Company has implemented monitoring and reporting mechanisms to identify and respond to human trafficking incidents within its operations. Reports can be made anonymously to Espersen HR or through Espersen’s Whistleblowing System. All reporting is treated with the utmost seriousness.

Espersen conducts due diligence on its recruitment channels to assess and mitigate the risks of human trafficking. This will include:

- Assessing the risk of human trafficking in different geographical regions and industries
- Evaluating the policies and practices of existing and potential suppliers and contractors
- Engaging with suppliers and contractors to promote awareness of our expectations regarding anti-human trafficking measures
- Implementing measures to monitor and address any identified risks

Responsible Recruitment Policy	Version 1	Revised:	Approver: Executive management
	Language: English	Created: 24/05/24	Content: HR director
Valid in: All group			
Page 1 of 2			

## Responsibilities

**Human Resources:** Ensure the implementation and compliance of the Responsible Recruitment Policy. Conduct training sessions on recognizing and preventing modern slavery and human trafficking

**Employees:** Report any suspicions of human trafficking through the designated channels

**Suppliers and Contractors:** Adhere to the Espersen’s Responsible Recruitment Policy and cooperate with audits and assessments

## Training and Awareness

HR provides training to employees, particularly those involved in procurement and supply chain management, to raise awareness of the risks of human trafficking and to ensure they understand their responsibilities under this policy.

## Communication and Reporting

Espersen communicates openly and transparently about its efforts to combat modern slavery and human trafficking. We encourage employees, suppliers, and other stakeholders to report any concerns related to modern slavery or human trafficking to report to Espersen HR or through our Espersen’s whistleblowing mechanism, without fear of retaliation. At the end of the year, If any reports are made internally and not through the whistleblower system, Espersen HR must report a summary of the incidents to group sustainability through the ESG reporting platform.

## Compliance and Review

This policy will be reviewed by HR every 6<sup>th</sup> month to ensure its effectiveness and relevance. We are committed to continuous improvement in our efforts to combat human trafficking.

## Conclusion

Espersen is dedicated to preventing modern slavery and human trafficking. Through this policy we affirm our commitment to ethical recruitment practices and the protection of human rights. We will work collaboratively with our stakeholders to uphold these principles and contribute to the eradication of these heinous crimes.

Responsible Recruitment Policy	Version 1	Revised:	Approver: Executive management
	Language: English	Created: 24/05/24	Content: HR director
Valid in: All group			
Page 2 of 2			