



Labor and Human Rights Policy

Introduction and purpose

At Kempower, respecting human rights is a core principle. We integrate supportive actions throughout our operations, ensuring the ethical treatment of workers and responsible sourcing practices. These efforts align with our commitment to social responsibility and sustainability, and we report on them annually to demonstrate our transparency.

Kempower's vision is to create the world's most desired EV fast charging solutions. Our DC fast chargers are designed and manufactured in Lahti, where Kempower's headquarters and production plant are located. The company has offices in Tampere, Helsinki, and Vaasa. Subsidiaries are in Germany, Sweden, Norway, UK, Holland, France, Spain, Italy, Poland, Australia and North Carolina. Production in the North Carolina has started end of year 2023.

The purpose of this policy is to define the labor and human rights standards in Kempower's operations. Kempower is committed to supporting human rights and promoting their protection in all our operations and interactions with our stakeholders. We recognize that human rights are universal, indivisible, and interdependent, and that they apply to all individuals, regardless of their race, ethnicity, national origin, gender, sexual orientation, age, religion, or any other characteristic.

Scope

This policy applies globally to all Kempower's operations, including but not limited to:

- Our workers regardless of their position or location. These include our own employees, as well as subcontractors, service providers, and agency workers.
- Our value chain, including all our suppliers, agency workers, contractors, and business partners, and we expect them to uphold the same human rights standards as we do.



- Our products and services, including all our products and services as we aim to ensure that they do not contribute to human rights abuses.
- Our interactions with stakeholders.

We recognize our role in upholding human rights as a part of a shared responsibility, in which we are ready to work collaboratively with our workers, suppliers, customers, and other stakeholders to promote their protection. We will also engage in ongoing dialogue with stakeholders to understand their perspectives and concerns, and to continuously improve our human rights performance.

Guiding Principles and commitments

We are committed to complying with all applicable laws and regulations related to human rights, as well as standards set by the Universal Declaration of Human Rights. We support the UN Guiding Principles on Business and Human Rights (UNGP) and International Labour Organization's (ILO).

We are committed to the following sustainability initiatives:

- UN Sustainable Development Goals (SDGs)
- UN Global Compact (UNGC)

Roles and responsibilities

The Board of Directors and the CEO, with the support of the Audit Committee and the Remuneration and Nomination Committee, are responsible for the company's overall management, including Sustainability.

Sustainability Manager is leading Cross functional sustainability group and is responsible sustainability in operational level at Kempower.

Forced and bonded labor

Kempower is committed to the right to freedom of work and prohibiting all forms of forced and bonded labor. We do not support, conduct or accept any form of coercion including use of violence, threats to harm workers or their families, or other forms of intimidation. All workers are free to move in and out of their workplaces and keep the original copies of their passports or other identification documents.

Kempower prohibits all forms of forced and bonded labor in our operations and value chain. We expect our suppliers, contractors, and business partners to do the same.

**Action Plan**

- Conduct regular risk assessments to identify and address any potential risks of forced and bonded labor in our operations and value chain.
- Provide regular training and awareness to relevant personnel in our organization.
- Monitor and report our operations and value chain to ensure compliance with this policy.

Child labor

Kempower does not under any circumstances use or support the use of child labor based on local laws. For young or juvenile workers, Kempower follows the Young Workes Act.

Action plan

- Assure age verification conducted in each hiring process
- Provide regular training and awareness to relevant personnel in our organization.
- Encourage anyone to speak up in case of a violation or suspected violation to this policy.

Freedom of Association and Labor Relations

Kempower allows that workers are free to form and join trade unions of their choice, without fear of retaliation or discrimination. This includes protecting the right to collective bargaining.

Employee Representation

Four elected representatives have been elected at Kempower Oyj's the representatives of the production employees and the representatives of office employees. They are members of the Personnel and Occupational Health and Safety Committee. Elected representatives are elected every second year, and employees choose who to vote into the posts.

Action Plan

- Provide space for employees to carry out related activities on our sites.
- Include this information in the onboarding process and provide space for communication from the labor unions to be available on our sites.



- Kempower ensures that the working conditions are flexible and applicable to our work by reaching guidelines on working conditions with the elected representatives. Guidelines are made in accordance with the collective agreements and legislation.

Working hours, remuneration, and benefits

Working hours

Working time principles are based on the Working Time Act, collective agreements, and local agreements. The local agreements are aimed at creating as flexible system as possible for workers to reconcile their working hours with their life circumstances and, if necessary, be flexible if the company's production/service demand so requires. Maximum working hours per week is from 37.5 to 40 hours depending on national legislation and collective agreements. Kempower follows a model in which each worker and supervisor agree upon the practices in the manner they consider best.

Kempower aims to always plan work in a way to avoid overtime. However, sometimes it is impossible to avoid overtime due to production bottlenecks and/or customer demands. Agreements have been made on compensation for overtime, and compensation begins at the same point for all employee groups.

Workers are always free to decline overtime, unless specifically agreed on and negotiated with the employees.

Action Plan

- Conduct regular risk assessments to identify and address any potential risks of exceeded work hour limitations in our operations and value chain.
- Provide regular training and awareness to relevant personnel in our organization.
- Monitor and report our work hours to ensure compliance with this policy.

Remuneration

The remuneration system at Kempower is agreed locally.

Kempower has a systematic way to assure fair and incentive pay scale based on the level of responsibility, competence, and performance of everyone. The objective of the



pay system is to ensure that the salary of an individual within the Kempower Grade pay scale is commensurate with his/her skills and performance.

The pay system is communicated to all employees and covers all personnel, except for members of the management team.

The remuneration system has been published 1st September 2022 and after that the remuneration system is implemented. First equal pay monitoring will be carried out in 2024.

Action Plan

- Provide regular training and awareness to relevant personnel in our organization
- Monitor and report our remuneration to ensure compliance with this policy

Working conditions

Kempower encourages a two-way communication regarding working conditions and has a system in place to facilitate workers to voice regarding working conditions.

Action Plan

Kempower has implemented systems to continuously follow-up on the efficiency of this policy:

- Offering its personnel occupational health services that are more comprehensive than those required by law.
- Work well-being monitoring in general: The satisfaction and work well-being of office workers is surveyed with a monthly pulse survey, a similar survey for production workers is carried out four times a year.

Diversity, Equity and Inclusion

For Kempower, diversity comprises the unique qualities of every individual:

Our goal is to systematically promote the diversity of our personnel when recruiting, developing, and engaging our people in all organizational levels. We aim to ensure an inclusive working environment where unique qualities are valued as strengths.

Kempower promotes and aims to protect everyone's right to be free from discrimination. Discrimination based on race or color, ethnicity, national origin, gender, sex, sexual orientation, age, religion, disability, or any other characteristic protected by



law, or which oppose equal opportunities, is not tolerated in our workplace or interactions with customers, suppliers, and other stakeholders.

Kempower will publish a separate DEIB policy in 2024.

Action Plan

- Conduct regular risk assessments to identify and address any potential risks of discrimination in our operations and value chain.
- Provide regular training and awareness to relevant personnel in our organization. These are included in the onboarding for all workers in their first day. DEIB is a current theme in company training plans.
- Monitor and report any risks, suspected violations to investigate violations.
Kempower

We will take immediate and swift action to minimize or eliminate any noted discrimination risk or violation to ensure compliance with this policy.

Equal opportunities and Career Management

Recruitment Principles

Kempower's business and its objectives define the skills needed at Kempower. The aim is that Kempower has the right people in the right places, at the right time. The situation and needs are constantly reviewed as new needs arise and the business grows. The recruitment process is communicated clearly and formally to all candidates. Kempower always allows existing personnel to apply for vacancies and they are visible on the Kempower intranet.

Recruitments are done according to the principles of equality and equity. The selection criteria for our positions are based on the competence and suitability of everyone and the potential for further development in new positions at Kempower.

Kempower hires top talent promoting diverse & inclusive hiring practices. Therefore, age is not something, that is specially asked from a candidate to avoid age discrimination. All ages are confirmed in the employment contract when signing.

Action Plan

- Hiring top talent and promoting diverse and inclusive hiring practices
- Kempower supports anonymous recruitment by allowing applications to be sent out without explicit personal details such as picture, age, or gender
- All applicants are handled and guided through the recruitment process equally



- Recruitments are carried out in accordance with the principles of equality and equity
- The selection criteria are the competence and suitability of the person for the position and the potential for further development in new positions at Kempower.

Training

Kempower focus on continuous learning, which is also included in the company's values. Kempower has a plan for educating its workers which will be updated annually. We strengthen and support the continuous learning of our personnel, with which we ensure that we can respond to changes in the operating environment proactively.

Action Plan

- Organization internal training for all workers based on company needs is arranged on regular basis
- Mandatory training or training programs for example Kempower Starter Bootcamp for new workers, Code of Conduct, Leadership training and training programs for managers

Career Management

Supervisors hold regular goal and development discussions with all employees, in which Kempower's strategy, business development prospects, etc. the content of the job is mirrored to the employee's current skills. Employees in different life situations and at different stages of their working career may have different and special competence needs and the need for competence development support. We strive to offer versatile and flexible skills development opportunities, considering all employee groups.

Action Plan

- Personal development plan made to all employees
- Personal development plan reviewed in target and development discussions

Harassment

Harassment Policy

Kempower does not allow any inappropriate treatment or harassment of another person. Kempower's harassment policy is following Occupational Safety and Health Act 738/2002 about the worker's duty and harassment.

Action Plan



- Training and guidance to all employees
- Actions based on Kempower's Harassment Policy

Health and safety

As an employer, Kempower is responsible for the safety and health of the personnel's working conditions in the ways required by law, creates the conditions for management that promotes well-being at work, and promotes activities that maintain work ability.

Health and safety Policy

Kempower has a Health and Safety Policy to prevent accident and cases of work-related ill health, manage health and safety risks and to ensure and maintain safe and healthy working conditions.

Occupational Safety and Health Action Plan

Kempower's occupational safety is governed by the Occupational Safety and Health Action Plan. The central principle of occupational health and safety is anticipation. Therefore, the employer must draw up an occupational health and safety action plan for the workplace. The action plan helps the employer to enhance proactive occupational safety and systematically develop working conditions according to the workplace's own needs.

Action Plan

Separate plans for maintaining work ability:

- Occupational health care action plan and service contract
- Occupational health and safety action program
- Work ability support model including Early support model
- Substance abuse program
- Principles and guidelines regarding harassment and inappropriate treatment
- The substitute work model
- Guidelines related to sickness absences



Whistleblowing

Our company strives to maintain a transparent business climate and high business ethics. We value the safety and respect of everyone affected by our business.

Whistleblowing provides an opportunity to report suspicions of misconduct; anything that is not in line with our values and policies. Our whistleblowing service is an early warning system to reduce risks. It is an important tool to foster high ethical standards and maintaining customer and public confidence in us. Kempower worker may also report violations of MAR and other related regulations and guidelines through the Whistleblowing service. The worker does not need to proof his/hers suspicions, but all messages must be made in good faith.

Primarily we encourage workers to contact a manager in our organisation. If a worker feels that he/she cannot be open with his/hers information, we offer the option of reporting the concern anonymously.

Whistleblowing can be used to inform about a concern about something that is not in line with our values and ethical code, and that may seriously affect our organization or a person's life or health.

The whistleblowing service is provided by an external partner WhistleB, Whistleblowing Centre, to ensure anonymity. The communication channel is encrypted and password protected. All messages will be processed in confidence.

Related policies

- Kempower Code of Conduct
- Kempower Supplier Code of Conduct
- Kempower Health&Safety Policy
- Kempower Harassment policy
- Kempower DEIB policy

Labor and Human Rights Policy approval

This labor and rights policy is approved by The Management Team.
The policy will be reviewed annually.