	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by</i> Head of ESG	<i>Page:</i> 1 of 27

Guideline for Human Right Impact Remediation

ASKER HEALTHCARE GROUP

05/09/2024



	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 2 of 27

Table of content

1. Background and Purpose	3
Scope	4
Roles and Responsibilities	4
Glossary	5
Human Rights Remediation Approach	0
2. Reporting Avenues	8
Direct report	8
Human Rights due diligence	8
Media allegation	8
Law enforcement or Regulators	8
3. Initial Response	8
Notification received by Human Rights Council (Step 1)	9
Triage the Report (Step 2)	9
Build the Response Team (Step 3)	11
Preliminary investigation and identifying those impacted (Step 4)	11
Safeguarding Those Impacted (Steps 5-7)	12
Potential Referral to Authorities (Step 8)	13
4. Correction and Remediation	14
Response Approach (Step 9)	14
Ceasing Impacts (Step 10)	17
Remediating Harm (Steps 11 - 12)	17
Preventing Future Impacts (Step 13)	18
Supporting correction and remediation efforts (Step 14)	19
5. Monitoring and Reporting	21
Monitoring (Step 15)	21
Reporting (Step 16)	21
6. Revision log	22
Appendix A: Universal Declaration of Human Rights	23

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 3 of 27

1. Background and Purpose

As stated in its Code of Conduct and Responsible Sourcing Policy, Asker Healthcare Group (“Asker”) is committed to protect the human rights of its personnel and those who may be impacted by its operations, including within its value chain. This commitment engages companies within Asker Healthcare Group (herein after referred to as “Local Companies”).


Asker is determined to provide appropriate, timely and meaningful responses to allegations of adverse human rights impacts in its companies’ operations and value chains. All responses are to be context-appropriate with paramount consideration to safeguarding those who have been impacted. If a Local Company learns it might be involved in a potential adverse impact to human rights, it shall act promptly and diligently.

The key elements that must always be incorporated into a Local Company’s response to allegations of adverse human rights impacts are:

- Involving people trained to respond to human rights violations, which may include trusted partners external to Asker;
- Ensuring those impacted are safeguarded;
- Leveraging the Local Company’s control and influence to cease the harmful activities as soon as possible and prevent future harm;
- Working directly and through partners to ensure those impacted are provided with support and where appropriate compensation sufficient to restore them to the situation that would have existed if the adverse impact had not occurred; and
- Being transparent by reporting (internally and publicly where appropriate) on the situation and its response while also protecting the privacy of those involved.

This document provides guidance on the types of responses that may be appropriate and an explanation of the considerations and steps to be performed. It conveys Asker’s process for effectively responding to allegations of adverse human rights impacts.

Regardless of the method through which adverse human rights impacts are discovered or reported, Asker should act quickly to identify and safeguard those who may have been impacted. Key priorities are (a) safeguarding those impacted (b) recognizing the need for involvement of specially trained people, which may include law enforcement or trusted partners, and (c) using Asker’s control and leverage to stop the impacting activities quickly whether they be within Asker or at a third-party.

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 4 of 27

Scope

This document applies to all entities within the Group (of which Asker Healthcare Group AB, directly or indirectly, controls 50% or more of the voting rights) and employees, managers, board members, consultants, or involved in responding to allegations of adverse human rights impacts.

In the event of any contradictions between this Guideline and any other local governing documents, this Guideline prevails (unless local legislation prescribes differently).

Roles and Responsibilities

Local Company:

- **Initial Response:** Act quickly to identify and safeguard those impacted by adverse human rights impacts.
- **Notification:** Inform the Human Rights Response Council of any potential adverse impacts.
- **Implementation:** Work with the Response Team to implement safeguarding and remediation measures.

Group (Asker Healthcare Group):

- **Oversight:** The Human Rights Response Council oversees and supports the response to human rights impacts.
- **Guidance:** Develops guidelines and procedures for addressing human rights impacts.
- **Monitoring and Reporting:** Tracks progress and reports on remediation efforts.


Human Rights Response Council:

- **Triage and Assessment:** Conducts initial triage and assessment of reported cases within two business days.
- **Response Team Appointment:** Appoints a Response Team within five business days.
- **Oversight:** Guides and supports the Response Team and ensures necessary resources are available.
- **Potential Referral:** Considers referral to authorities if necessary.

Response Team:

- **Investigation:** Conducts preliminary investigations and identifies those impacted.
- **Safeguarding:** Implements safeguarding measures for impacted individuals.
- **Remediation:** Develops and executes remediation plans.

Clarifications

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 5 of 27

Role of Local Company vs. Group:

- The Local Company is responsible for the immediate response and implementation of safeguarding and remediation measures. The Group provides oversight, guidance, and resources through the Human Rights Response Council.

Glossary

Adverse human rights impacts: when a basic human right of a person or persons is negatively affected. See Appendix A for a list of the United Nation’s 30 Basic Human Rights.

Cause: when Asker / Local Company’s operations directly result in modern slavery practices and other adverse human rights impacts.

Contribute to: when Asker / Local Company’s operations and/or actions in its supply chain, including acts or omissions, may facilitate or incentivise or contribute to modern slavery practices or other adverse human rights impacts.


Directly linked to: when Asker / Local Company’s operations, products or services may be connected to modern slavery or adverse human rights impacts through the activities of another entity Asker has a business relationship with, including those in its supply chain, even those with which Asker / Local Company does not have a direct contractual relationship.

Human Rights Response Council: the group of business leaders charged with overseeing Asker’s response to and remediation of possible negative human rights impacts. It consists, at a minimum, of General Counsel, Head of ESG, Head of Human Resources, and Head of Communications. The Human Rights Response Council reports to the CEO of Asker Healthcare Group.

Implementation Plan: the approach developed by the Response Team to cease the impacts, remediate the harm, and prevent further negative human rights impacts.

Information Gathering Principles: the following principles which must be applied to the collection of information regarding a report of adverse human rights impacts:

- if any information that could reasonably identify someone is gathered, the process must adhere to relevant regulations, such as the General Data Protection Regulation as well as Asker’s Code of Conduct and related governing documents; and
- whenever possible those impacted should be protected by:
 1. maintaining strict confidentiality;
 2. acting with express and informed consent of the impacted people where it is possible to identify them; and
 3. explicitly informing (and where required obtaining consent of) impacted people when information is shared with third parties.

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 6 of 27

Remediation: the process of providing a remedy with an aim of restoring those harmed to the situation which they would have been in if the adverse human rights impacts had not occurred.

Notice! Both Remediation and Corrective & Preventative Actions (CAP) participate to adverse impact mitigation and management phase, but Remediation is not to be confused with Corrective & Preventative Actions (CAP). Corrective & Preventative Actions include forward-looking actions to prevent a non-compliance from recurring and often take place before an impact occurs (albeit a CAP can be used to achieve remediation).

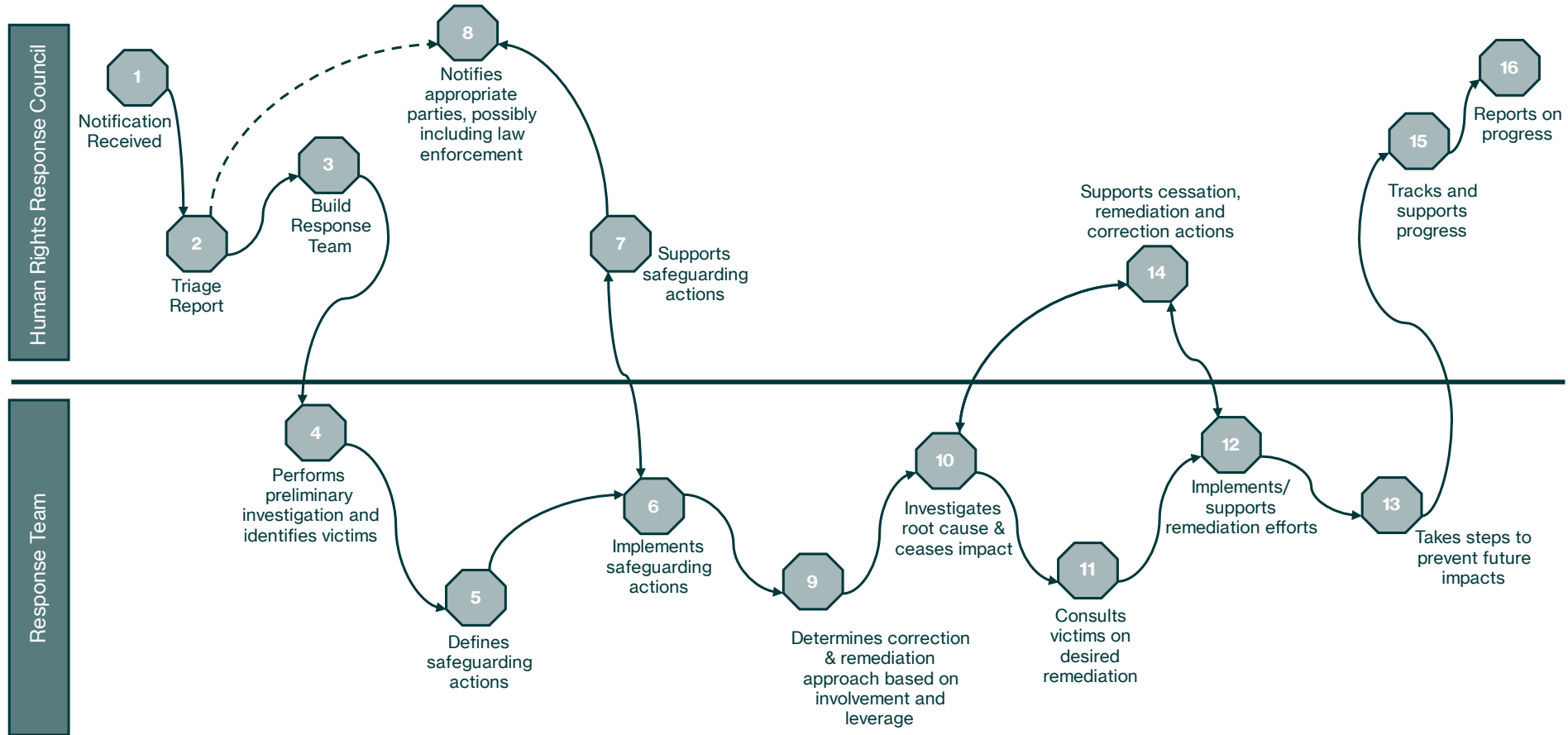
Remedy: a substantive outcome of the remediation process, an act that can counteract, or “make good” for an adverse impact. Appropriate forms of remedy can take a range of forms such as apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition.


Report: allegation that a potential human rights impact/s has occurred. All reports undergo the same response and remediation process regardless of their source (i.e., internal or external).

Response Team: the group of individuals with the necessary skills and experience to deal with the specific report of adverse human rights impacts, led by a qualified individual trained in the handling cases of adverse human rights impacts including modern slavery. It includes, at a minimum, the Managing Director of the Local Company involved with the adverse impact, the concerned Business Area Director, and the Group Sustainability Director.

Responsible party: the party, be it an individual, organization or government, that took the actions which caused the adverse human rights impact/s.

Human Rights Remediation Approach



	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2022.05.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 8 of 27

2. Reporting Avenues

The following are the avenues through which concerns or allegations of adverse human rights impacts may come to Asker’s attention. The avenue through which the report/s are received will have some impact on the steps taken.

Direct report

An adverse human rights impact may be reported directly to an employee of Asker or through Asker’s Whistleblowing channel or other grievance mechanisms. When a direct report is received it will be important to determine whether whistleblower protections apply as outlined in Asker’s Procedure on Whistleblowing.

Human Rights due diligence

An adverse human rights impact may be discovered through Asker’s Human Rights due diligence processes including via:

- direct observation;
- audits revealing data indicative of adverse human rights impacts;
- data provided by stakeholders in response to questionnaires (such as a modern slavery questionnaire);
- discussion and engagement with suppliers and other third-parties; and
- available grievance mechanism/s

Media allegation


It may be that the first news of a potential adverse human rights impact is received via stories in the media. If this occurs, Local Company must inform Asker’s Head of Communication as soon as possible as a part of the response.

Law enforcement or Regulators

Local Company may first learn of an allegation of an adverse human rights impact when notified by law enforcement or regulators that an investigation is underway. If this occurs, Local Company must inform Asker’s Head of Communication as soon as possible as a part of the response.

3. Initial Response

Local Company

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 9 of 27

Regardless of the method through which adverse human rights impacts are discovered or reported, Asker should act quickly to identify and safeguard those who may have been impacted.

Prior to the collection or creation of any documents (including emails) Local Company must notify Asker’s Human Rights Response Council of the potential adverse human rights impact (as outlined below) so that it may discuss the preliminary investigation process and documentation issues (such as confidentiality, privacy, and legal professional privilege).

Notification received by Human Rights Council (Step 1)

Human Rights Response Council


The first step after a concern or allegation is received by a Local Company is to immediately report it to Asker’s Human Rights Response Council (“Council”) which provides oversight of and support for Asker’s response. This should be done within two (2) business days (or, at the latest, within three (3) calendar days to account for weekends or holidays). The Council consists, at a minimum, of General Counsel, Head of ESG, and Head of Human Resources.

Triage the Report (Step 2)

Human Rights Response Council

Once the matter has been reported to the Council, the Council’s first step is to triage the report. The goal of the triage process is to:

1. Evaluate appropriateness to respond.
The Human Rights Response Council should conduct an initial triage and assessment of reported cases. This involves evaluating the appropriateness of activating the remediation process, determining the severity (evaluate the gravity of the violation to determine an appropriate response; this involves understanding the impact on the victim(s) and the context in which the violation occurred) and relevance of the reported issues, and deciding whether further escalation to the Group Crisis Team is warranted. This step ensures that only cases with potential or actual adverse impacts are escalated, thus optimizing resource allocation and response efforts. All discarded cases (cases not escalated for remediation) should be clearly explained and documented in writing by the Human Rights Response Council. Based on the circumstances, the Council should also consider whether immediate involvement of law enforcement is required even prior to setting up the Response Team (see Step 8 below).

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 10 of 27

2. Conduct a preliminary assessment of Asker’s level of Involvement.
Determining the level of relationship that Asker has with the adverse human rights impact is crucial for determining the responsibilities of Asker in addressing the human rights abuse. Consult with external legal advisors if deemed necessary.

- a. **Cause:**

Asker / Local Company may be considered to cause an adverse human rights impact if its own actions or omissions directly result in that impact. This means the business is the primary actor responsible for the harm. In such cases, Asker has a responsibility to cease the action causing the harm and provide remediation action for those persons impacted.

- b. **Contribute:**

Asker / Local Company may contribute to an adverse human rights impact if its actions or omissions, in combination with those of other entities, lead to the impact. This involves a shared responsibility where Asker’s conduct plays a significant role in the harm occurring. In such cases, Asker should take action to cease or prevent its contribution and provide for, or cooperate with other entities involved, in remediation work.


- c. **Directly linked to:**

Asker / Local Company may be directly linked to an adverse human rights impact if the impact is connected to its operations, products, or services through a business relationship, even if Asker itself did not cause or contribute to the impact. In such cases, Asker is not responsible for causing the harm but is expected to use its leverage to influence the entity causing the impact to cease the related activities.

3. Identify the skills and support that will be needed to properly respond to the situation.

It is possible the Council may be required to seek some additional information to inform its assessment having regard to the Information Gathering Principles, but prompt response is key, so this should only include information which is easily at hand, not items that require investigation.

The initial triage and assessment should be completed within a maximum of two (2) business days from receiving the report (or, at the latest, within three (3) calendar days to account for weekends or holidays).

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 11 of 27

Build the Response Team (Step 3)

Human Rights Response Council

The Council appoints a Response Team based on its triage of the report. Because safeguarding the victims is of primary concern, the Response Team should include a qualified individual trained in the handling cases of adverse human rights impacts including modern slavery. The Response team might need to include a local, qualified individual in external communication if required by circumstances. If the necessary skills cannot be provided within Asker’s available personnel, the Council will need to find the appropriately skilled and trained individuals from sources external to Asker. The involvement of external resources does not change the need for Asker to conduct investigation and remediation processes, including safeguarding those impacted. The appointment of the Response Team should be done within a maximum of five (5) business days from receiving the report.

The role of the Response Team is outlined in further detail below, and includes:


- undertaking a preliminary investigation;
- safeguarding victims;
- determining and implementing correction and remediation measures;
- determining responses and actions with regards to external communication, if appropriate, and
- working with the Council.

Preliminary investigation and identifying those impacted (Step 4)

Response Team

After its appointment, the Response Team should commence a preliminary investigation to answer the following questions:

- What has caused the negative impacts?
- Who are the people impacted? What is their relationship to Asker (employees, supplier, suppliers employee, contractor, etc.)?
- What are the details of the concerns raised? When and where did it occur / is it occurring? What was the nature of the incident/s? Which persons and entities were / are involved?
- Who is the Responsible party? (Who took the actions which caused the adverse human rights impact/s? What is their level of involvement in those actions based on the distinction ‘Caused/Contributed to/Directly Linked’?

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 12 of 27

- Who made the report, or raised concerns regarding the possible adverse human rights impacts? How did the person become concerned?

In conducting this preliminary investigation, the priority is to identify those impacted so that safeguarding measures can be implemented (as outlined further below).

Adverse human rights impacts may be difficult to identify definitively. For this reason, it may initially be unclear whether someone has been impacted and which rights may have been engaged. The Response Team should obtain as much information as possible to determine whether the report relates to a significant risk of adverse impacts or to an actual impact that may have occurred. In cases where special circumstances make the remediation of an actual impact impossible (for example: affected persons cannot be traced), the Response Team should consider whether the situation is likely to affect more victims and, if so, focus on preventing further impacts from happening.

At all stages during the preliminary investigation and when identifying those impacted, the Response Team is required to abide by the Information Gathering Principles.

The questions outlined above represent the minimum information likely needed to position Asker to safeguard the potential victims involved. Further investigation can and should happen before developing Asker’s remediation response (discussed at [Step 9](#)), but not until those impacted have been safeguarded as per [Steps 5, 6, and 7](#)).

Safeguarding Those Impacted (Steps 5-7)


Response Team

Defining and implementing safeguarding measures (Steps 5 and 6)

After those who have been impacted have been identified and a preliminary investigation undertaken, the Response Team should take a measured approach to safeguarding those persons and define the safeguarding actions it will take. Safeguarding those impacted means taking action to protect the immediate safety and personal security of impacted persons.

Any safeguarding measures should be undertaken with the following principles in mind:

- The prospects for the person’s safety and security may be enhanced by a risk assessment being completed before any action is taken. In this regard, expert advice should be sought and / or the Response Team may partner with a local response agency.

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 13 of 27

- Safeguarding action may require participation of national authorities and / or expert partners. To the extent the Response Team considers that the authorities should be notified, the team should advise the Council and the Council will determine whether to make such a notification as outlined at Step 8.
- Where possible, informed consent should be obtained from the impacted person/s (and/or their parent, guardian or carer if required), however that person's safety and security are the priority and direct access to them may be difficult to obtain.
- The impacted person/s right to confidentiality and privacy should be respected.
- Treatment and care should be individualised to provide the most appropriate protection, assistance and support to the needs and circumstances of the affected person/s.

If Asker / Local Company is not the responsible party, it should attempt to work in collaboration with the responsible party to safeguard those impacted by the subject adverse human rights impacts.

Before undertaking any safeguarding measures, the Response Team should advise and consult with the Council of the safeguarding measures it proposes to take.

Once such consultation with the Council has taken place, the Response Team should implement the approved safeguarding measures.

Supporting safeguarding measures (Step 7)

Human Rights Response Council


As part of its oversight role, the Council guides and supports the efforts of the Response Team during the Initial Response. This includes providing feedback if it has concerns that the safeguarding actions designed by the Response Team will not adequately protect the human rights of those impacted.

The Council also is responsible for ensuring the necessary support mechanisms (e.g., psychosocial assistance, housing assistance, or legal assistance) for the efforts are resourced and available and acts as the point of contact for the relevant processes. Details of potential support mechanisms are discussed further below.

Potential Referral to Authorities (Step 8)

Human Rights Response Council

The Council (with the aid of its legal advisors and the Response Team) considers whether the matter should be referred to investigative or enforcement authorities. This should generally be done where violence or criminality are involved and where Asker is confident

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 14 of 27

that such a referral should not put the victim at risk of further harm. Asker should determine whether external legal advice should be sought prior to making notifications. The Council is also responsible for identifying whether it is appropriate to notify other parties within Asker of the report and Asker’s corresponding investigation and response.

4. Correction and Remediation

Once initial safeguarding measures have been undertaken, attention shifts to the remediation of the adverse human rights impacts and correction of the activities which gave rise to those impacts. Any remediation and correction should generally involve:

- Ceasing the impactful activities;
- Remediating the harm by returning those impacted to a state as close as possible to where they were before the impacts occurred; and
- Making changes to prevent any future impacts.

Asker cannot plan specifically how it will achieve these three elements of remediation and correction until it determines its level of involvement and leverage in the situation, as these factors will dictate its approach and the nature of the actual impact will affect the forms of remediation appropriate to be taken.

It is important to remember here that each step in developing correction and remediation responses should focus on what is best for the people potentially impacted by the raised concerns, including by adhering to the Information Gathering Principles.


Response Approach (Step 9)

Response Team

Determination of correction and remediation approach based on involvement and leverage (Step 9)

Asker should ensure that the instances of adverse human rights impacts are corrected and remediated.

The Response Team’s remediation and correction approach will depend on the nature of Asker’s relationship with, and the amount of leverage Asker has over, the responsible party. The closer Asker’s involvement and the more influence it has over the circumstances in which the adverse human rights impacts occurred, the more likely it will be able to take direct action. However, where Asker has less involvement and leverage, Asker will need to utilize less direct methods.

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 15 of 27

Guidance on the differing levels of involvement and leverage Asker may have in these situations (and the implications of such) is outlined below.

Level of Involvement

Determining the level of relationship that Asker has with the adverse human rights impact is crucial for determining the responsibilities of Asker in addressing the human rights abuse. Consult with legal team if necessary


- **Cause:**
Asker has a responsibility to cease the action causing the harm and provide remediation action for those persons impacted.
- **Contribute:**
Asker should take action to cease or prevent its contribution and provide for, or cooperate with other entities involved, in remediation work.
- **Directly linked to:**
Asker is not responsible for causing the harm but is expected to use its leverage to influence the entity causing the impact to cease the related activities.

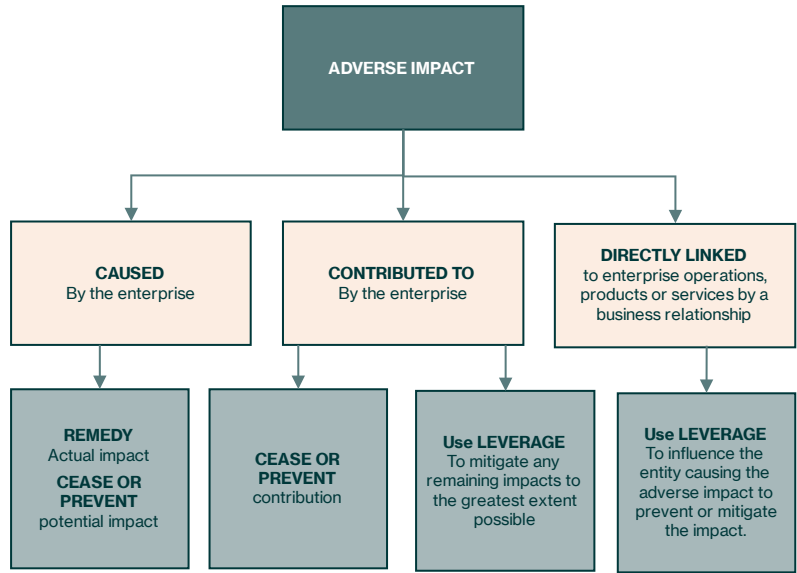
Level of Leverage

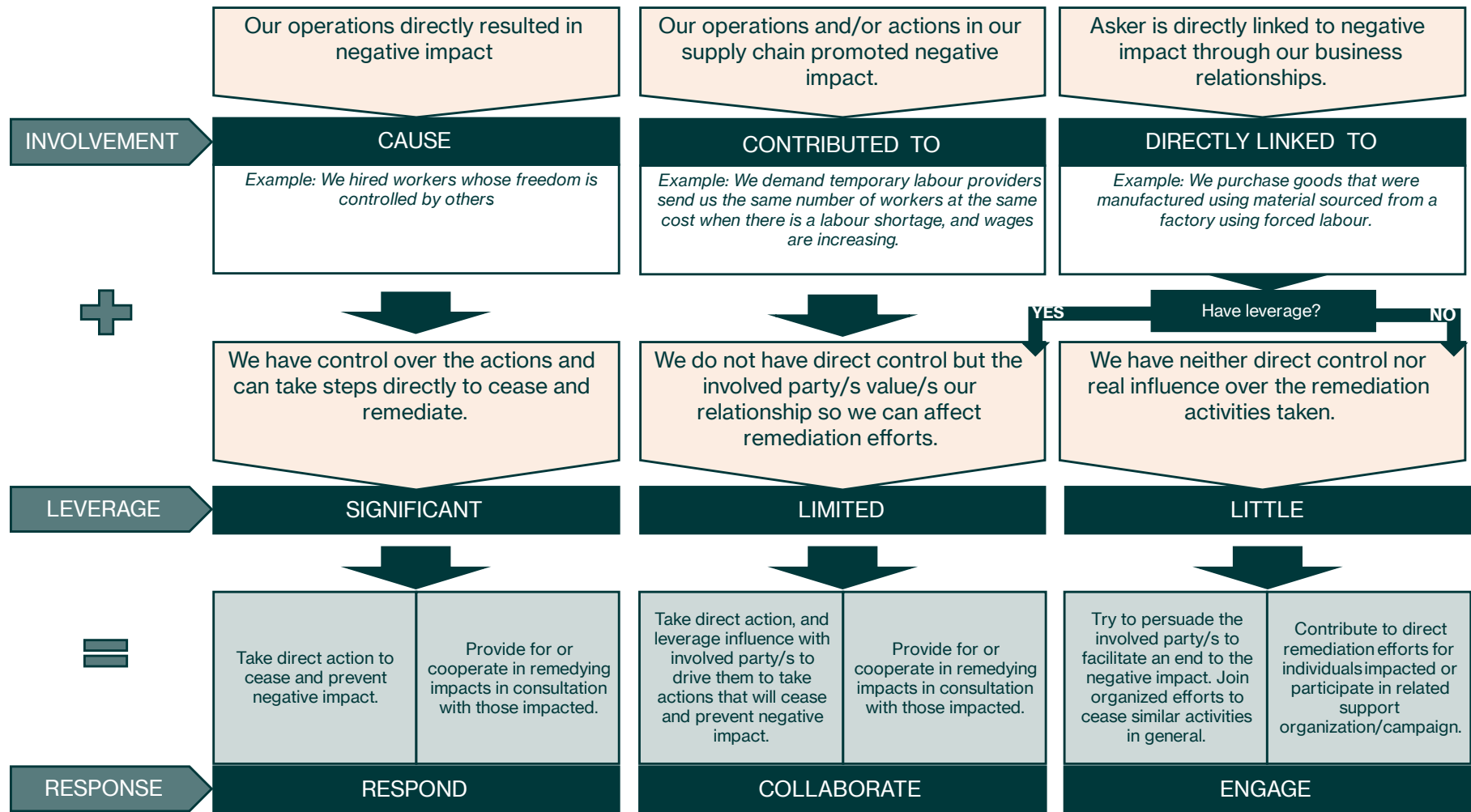
- Asker has significant leverage when it controls the activities causing the impact(s), for example when Asker manages the operations where the adverse human rights impacts occurred.
- Asker has limited leverage when it does not directly manage the operations where the adverse human rights impacts occurred. However, Asker’s relationship with the party whose activities are causing the adverse impact/s can create the opportunity for Asker to exercise some, or even substantial, leverage over the impacting party’s handling of the situation. For example, if Asker is a major customer of the impacting party, Asker likely has substantial leverage.
- Asker’s leverage over the impacting party diminishes when there is more distance between Asker and that entity operations-wise (e.g., the subcontractor of a subcontractor) and the smaller the portion of the entity’s income Asker’s business represents for that party (e.g., infrequent or small purchases or material volume). In these situations, Asker has little leverage.


Approach Options

Asker’s response approach will be based on the combination of its level of involvement and leverage as outlined above. The chart below illustrates the various response approaches (Respond, Collaborate, Engage) based on these combinations. These response approaches are also discussed in more detail below.

	Document type: Group Guideline	Version: 1.0
	Prepared by: Group Sustainability Director	Date: 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	Approved by: Head of ESG	Page: 16 of 27





	<i>Document type:</i> Group Procedure	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 16 of 27

Respond

Where Asker has control of the actions or behaviours that directly resulted in the adverse human rights impacts, Asker should robustly respond and promptly:

- take all available steps to cease the activity/s or behaviours that are adversely impacting human rights; and
- act to remediate those impacted.

Where the alleged adverse human rights impacts are within Asker’s operations or supply chain or a supplier’s operations or supply chain, and Asker has significant leverage with the supplier, Asker should also robustly **respond**. Such response may involve making changes to processes and controls including due diligence, incentive structures, payment terms, working conditions, wage and hour practices, etc. Caution should be taken here before utilising any termination clauses with impacting party/s, as this may detrimentally affect victims. Remediation in the context of third parties is discussed further below.

Collaborate


Where adverse human rights impacts are identified within a supplier, vendor, customer, or other business partner with whom Asker has only limited influence, Asker should collaborate.

In these cases, Asker should open dialogue with the impacting party(ies) where possible, and collaborate with industry groups, building networks and developing a multilateral strategy to mitigate, address and prevent adverse human rights impacts from occurring. This could involve initiating or joining a partnership that collaborates to identify and remedy adverse human rights impacts.

Engage

Where adverse human rights impacts are discovered or alleged to have occurred within organisations with whom Asker has little leverage or influence (for example non-contracted suppliers, non-managed joint ventures, or deep in its supply chain), Local Company should engage with the other party and seek to confirm it is implementing a plan of action to cease and address the reported adverse human rights impacts. At a minimum the approach should include Local Company requesting the other party to keep Asker informed of:

- the nature of the impacts found or alleged;
- the steps the other party is taking to remedy the impacts; and
- regular updates on the development of the response and those impacted.

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 17 of 27

Where a Local Company has a contractual relationship with the entity within which the adverse impacts are occurring, Asker should engage with that entity to ensure that entity fulfils its contractual obligations to remedy the impacts at the entity's cost.

Where Local Company does not have contractual rights to require remediation, or if the other party is not able or willing to do this, Asker should consider its capacity to support/collaborate with the other party to remediate or seek access to directly remediate (as discussed above). Once Asker's approach to correction and remediation has been identified, the Response Team can develop their Implementation Plan.

Disengage responsibly

Where there are repeated failed attempts to influence and engage an entity in ceasing actions that cause or contribute to human right impact, Asker / Local Company should consider disengagement. Disengagement should be conducted in a responsible time bound way, ensuring in the first instance that victims are supported, as it can be detrimental to them.

Before taking this step, Asker / Local Company should establish with the responsible party that if there is to be an ongoing relationship it will require their commitment to the identification, assessment and addressing of the potential for their operations to adversely affect human rights.

Ceasing Impacts (Step 10)

Response Team


Investigating the root cause and ceasing impacts (Step 10)

The Response Team investigates the root cause(s) of the adverse human rights impacts, identifying the activities and behaviours that contributed to the negative outcomes. Once the cause/s are known, the Response Team establish actions to be taken, and take them in order to cease the impacts as quickly as possible. As already discussed, these actions and Asker's role in getting them implemented will depend on its level of involvement and influence.

Remediating Harm (Steps 11 - 12)

Response Team

Asker should provide for or cooperate in remediation when Asker caused or contributed to an adverse impact to internationally recognised human rights. When remediation is

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 18 of 27

required, it may be provided by Asker alone or in cooperation in circumstances where Asker is not the only entity that caused or contributed to an adverse impact to internationally recognised human rights.

Consulting with victims of desired remediation (Step 11) and possible remediation

Wherever possible and having regard to the Information Gathering Principles, the Response Team should engage and consult with those experiencing the adverse human rights impacts:

- in respect of the appropriate remediation; and
- to ensure they are provided with the necessary support and compensation to restore their situation to the situation they would be in if the adverse impact had not occurred.

Support should be tailored to the needs of the affected person/s and may include:

- legal assistance;
- medical care;
- housing support; and
- psychological support.

Potential restitution or compensation may include:

- compensation for pain and suffering endured;
- compensation for lost wages or illegal wage deductions;
- in the context of modern slavery - reimbursement of recruitment fees or illegal deposits; and
- in the context of trafficking or migrant labour, ensuring safe return home.


Note that it may be difficult to have direct access to victims, and application of the safeguarding principles must always apply.

Implementing and supporting remediation efforts (Step 12)

Based on its investigation and assessment, the Response Team will develop Asker’s Implementation Plan which defines the correction and remediation actions to be taken.

Preventing Future Impacts (Step 13)

Response Team

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 19 of 27


In response to instances of modern slavery, Asker should implement preventative measures to mitigate risk of continued or repeated adverse human rights impacts. Such measures might include:

- more targeted education and information for relevant and affected Asker’s stakeholders;
- improvements to due diligence processes to prevent and respond to risks of adverse human rights impacts;
- in the context of modern slavery - protecting Asker’s and its stakeholders’ employees, particularly migrant workers, from possible abusive and fraudulent practices;
- modifying Asker’s whistleblowing and human rights policies and procedures to greater protect persons who report on adverse human rights impacts, and training Asker’s staff and contractors on these policies and procedures;
- reviewing contractual relationships following reports to ensure adequate leverage for Asker to influence or require risk minimisation programs or remediation;
- ensuring access to Asker’s grievance mechanism is widely advertised, available and accessible to employees, suppliers and employees of suppliers considering language barriers, and ensuring that the said grievance mechanism is considered effective as per UNGP 31 (effective and meaningful operational-level grievance mechanisms can play a key role in impact management, both as a resource to identify impacts as well as a means to address any grievances associated with the Human Rights Due Diligence process itself);
- changing Asker’s practices that caused or enabled the adverse human rights impacts to exist;
- holding Asker’s employees and contractors accountable if their failure to meet Asker’s standards for human rights contributed to the adverse human rights impacts; and
- working with non-governmental organisations specializing in human rights including modern slavery to drive regulatory, enforcement, cultural and other changes in the areas in which Asker operates.

Supporting correction and remediation efforts (Step 14)


Human Rights Response Council

In its oversight role the Council guides and supports the efforts of the Response Team to cease the activities and behaviours causing the negative impacts; implement the remediation activities; and take steps to prevent future impacts. This may include providing

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 20 of 27

feedback as well as lending its authority and support to the team’s endeavours. The Council should consider:

- Proportionality of the remediation efforts:
 - Are the remedies developed proportional to the severity of the violation? (Remedies can include apologies, restitution, rehabilitation, financial compensation, and guarantees of non-repetition).
 - Are the remedies developed contextually adapted to the specific circumstances and needs of the victims? (Taking into account cultural, social, and economic factors).
- Transparency of the remediation efforts:
 - Is the communication with all stakeholders involved (including victims, perpetrators, and relevant third parties) clear, open and honest?
 - Does the communication with stakeholders involve explaining the remediation process, expected outcomes, and timelines?
 - Are regular updates on the progress and outcomes of the remediation process provided to the affected parties and, where appropriate, to the public?

	<i>Document type:</i> Group Procedure	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 21 of 27

5. Monitoring and Reporting

Monitoring (Step 15)

Human Rights Response Council

Tracks and report on progress (Step 15)

The Council is responsible for monitoring and supporting the remediation activities for completeness and effectiveness. Measures to assess the effectiveness of the remedies may include:

- Tracking the implementation of remedies and evaluating whether the desired outcomes are achieved.
- Establishing systems for collecting feedback from stakeholders on the remediation process and outcomes, and use this feedback to make necessary adjustments and improvements.
- Using the acquired insights to improve the remediation procedures continuously and integrate lessons learned into future remediation efforts to prevent recurrence of similar violations.


The Council may delegate the monitoring and assessment to other parties inside or outside of Asker as appropriate, however will remain accountable for the performance of the remediation activities.

Reporting (Step 16)

Human Rights Response Council


Reports on progress (Step 16)

The Council provides transparency for Asker's stakeholders around the allegations, findings and actions taken. The Council does so by reporting (internally and publicly where appropriate) on investigation outcomes, remediation steps, monitoring, and effectiveness. In so doing, the Council will protect the privacy of those affected by adverse human rights impacts.

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by</i> Head of ESG	<i>Page:</i> 22 of 27


6.Revision log

Version	Valid from	Revision	Approved by
1.0	2024-09-20	New	Sanna Norman (Head of ESG)


	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 23 of 27

Appendix A: Universal Declaration of Human Rights

1. **All human beings are free and equal** All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.
2. **Freedom from discrimination** Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.
3. **Right to life** Everyone has the right to life, liberty and security of person.
4. **Freedom from slavery** No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.
5. **Freedom from torture and inhuman treatment** No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.
6. **Right to recognition before the law** Everyone has the right to recognition everywhere as a person before the law.
7. **Right to equality before the law** All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation and against any incitement to such discrimination.
8. **Right to remedy** Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.
9. **Freedom from arbitrary arrest or detention** No one shall be subjected to arbitrary arrest, detention or exile.
10. **Right to a fair trial** Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him.
11. **Presumption of innocence** Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defence. No one shall be held guilty of any penal offence on account of any act or omission which did not constitute a penal offence, under national or international law, at the time when it was committed. Nor shall a heavier penalty be imposed than the one that was applicable at the time the penal offence was committed.
12. **Right to privacy** No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.
13. **Freedom of movement and residence** Everyone has the right to freedom of movement and residence within the borders of each state. Everyone has the right to leave any country, including his own, and to return to his country.
14. **Right to seek asylum** Everyone has the right to seek and to enjoy in other countries asylum from persecution. This right may not be invoked in the case of prosecutions genuinely arising from nonpolitical crimes or from acts contrary to the purposes and principles of the United Nations.
15. **Right to nationality** Everyone has the right to a nationality. No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.
16. **Rights to marry and have family** Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution. Marriage shall be entered into only with the free and full consent of the intending spouses. The family is the natural and fundamental group unit of society and is entitled to protection by society and the State.
17. **Right to own property** Everyone has the right to own property alone as well as in association with others. No one shall be arbitrarily deprived of his property.

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by:</i> Head of ESG	<i>Page:</i> 24 of 27

18. **Freedom of thought, conscience and religion** Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.
19. **Freedom of opinion and expression** Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.
20. **Right to peacefully assemble** Everyone has the right to freedom of peaceful assembly and association. No one may be compelled to belong to an association.
21. **Right to take part in government** Everyone has the right to take part in the government of his country, directly or through freely chosen representatives. Everyone has the right of equal access to public service in his country. The will of the people shall be the basis of the authority of government; this will shall be expressed in periodic and genuine elections which shall be by universal and equal suffrage and shall be held by secret vote or by equivalent free voting procedures.
22. **Right to social security** Everyone, as a member of society, has the right to social security and is entitled to realization, through national effort and international co-operation and in accordance with the organization and resources of each State, of the economic, social and cultural rights indispensable for his dignity and the free development of his personality.
23. **Right to work** Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment. Everyone, without any discrimination, has the right to equal pay for equal work. Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection. Everyone has the right to form and to join trade unions for the protection of his interests.
24. **Right to rest and leisure** Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.
25. **Right to an adequate standard of living** Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control. Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection.
26. **Right to education** Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit. Education shall be directed to the full development of the human personality and to the strengthening of respect for human rights and fundamental freedoms. It shall promote understanding, tolerance and friendship among all nations, racial or religious groups, and shall further the activities of the United Nations for the maintenance of peace. Parents have a prior right to choose the kind of education that shall be given to their children.
27. **Right to participate in cultural life of the community** Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits. Everyone has the right to the protection of the moral and material interests resulting from any scientific, literary or artistic production of which he is the author.
28. **Freedom around the world** Everyone is entitled to a social and international order in which the rights and freedoms set forth in this Declaration can be fully realized.
29. **Everyone has duties to the community** Everyone has duties to the community in which alone the free and full development of his personality is possible. In the exercise of his rights and freedoms, everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society. These rights and freedoms may in no case be exercised contrary to the purposes and principles of the United Nations.

	<i>Document type:</i> Group Guideline	<i>Version:</i> 1.0
	<i>Prepared by:</i> Group Sustainability Director	<i>Date:</i> 2024.09.05
<i>Guidance for Human Right Impact Remediation</i>	<i>Approved by</i> Head of ESG	<i>Page:</i> 25 of 27

30. **Human rights are universal** Nothing in this Declaration may be interpreted as implying for any State, group or person any right to engage in any activity or to perform any act aimed at the destruction of any of the rights and freedoms set forth herein

Source: [Universal Declaration of Human Rights | United Nations](#)