

Modern Slavery and Human Trafficking Policy

Approved by the Management

This is a summary version of Probi's internal policy. This document only presents the main objectives of the policy.

Purpose:

Probi Group is committed to preventing modern slavery, human trafficking, and forced labor within its operations and supply chains. This policy upholds ethical practices and compliance with international standards and laws, including the Ethical Trading Initiative (ETI) Base Code.

Key Commitments:

1. Scope:

Applies globally to all employees, contractors, suppliers, and business partners across Probi's locations, including the U.S., Sweden, and Singapore.

2. Definitions:

- **Modern Slavery:** Includes slavery, servitude, and forced labor.
- **Human Trafficking:** Exploiting individuals through coercion, fraud, or force.
- **Forced Labor:** Work performed involuntarily under threat of punishment.

3. Policy Statement:

- Prohibits forced, bonded, or prison labor in any operations or supply chains.
- Respects workers' rights, including freedom of association and collective bargaining.
- Ensures employees are free to leave employment with reasonable notice and retain personal documents.

4. Responsibilities:

- **Management:** Conducts risk assessments, audits, and ensures compliance.

- **Employees:** Reports concerns and participates in awareness programs.
- **Suppliers and Partners:** Must comply with Probi's standards and maintain clean supply chains.

5. Risk Management and Due Diligence:

- Implements a supplier code of conduct addressing modern slavery.
- Works with suppliers to identify and address risks.

6. Training and Awareness:

- Provides training to help identify and prevent modern slavery.
- Promotes awareness about ethical practices and reporting mechanisms.

7. Reporting and Whistleblowing:

- Maintains a secure whistleblowing channel for confidential reporting.
- Protects whistleblowers from retaliation and investigates reports thoroughly.

8. Remediation Measures:

- Supports affected individuals, including providing access to education and training.
- Collaborates with authorities to address and remediate improper employment practices.

9. Monitoring and Review:

- Conducts regular reviews of the policy and processes.
- Reports progress in annual sustainability updates.

10. Compliance and Enforcement:

- Non-compliance may result in disciplinary actions, including termination.
- Cooperates with law enforcement to handle violations.

Core Values:

Probi is dedicated to ethical operations, ensuring modern slavery and human trafficking have no place in its business or supply chains. This policy reinforces Probi's zero-tolerance approach and promotes accountability, transparency, and continuous improvement.