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NILFISK		Human Rights Policy		Effective date: 12-12-2024
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Human Rights Policy

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Approved by Nilfisk Leadership team:
EVP, CMO and Head of CSR Camilla Ramby
EVP, CHRO People, Organization & Culture, Siam Schmidt

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1. Policy objectives

Nilfisk works with a people-centered approach seeking to drive positive impact within its business sphere.

Nilfisk is committed to conducting its business with high integrity, social responsibility and in compliance with applicable laws, international standards and recommendations, and fulfill relevant expectations of our customers and stakeholders.

We commit to taking appropriate action, within our sphere of business in our value chain, and to address adverse impacts on Human Rights relevant to our value chain.

Nilfisk's commitment to human rights includes working towards elimination of discrimination on the grounds of racial and ethnic origin, color, sex, sexual orientation, gender identity, disability, age, religion, political opinion, and any other form of discrimination or harassment, and we work to promote equal opportunities.

Related documents:

This policy is aligned with the Nilfisk

- Code of Conduct
- Supplier Code of Conduct
- Whistleblower Policy
- Statement on UK Modern Slavery Act
- Diversity, Equity and Inclusion Policy
- Health & Safety Manual
- Customer Health & Safety Policy
- DMA playbook

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2. Scope of Policy

This policy covers all sites owned or operated by Nilfisk, all Nilfisk employees including temporary workers and consultants, and extends to our entire value chain, covering suppliers, logistics & warehouse partners, as well as other business partners (e.g. Nilfisk dealers).

We expect our employees, suppliers, logistics & warehouse partners, as well as other business partners to uphold the values and commitments outlined in this Human Rights policy and assist Nilfisk in its efforts to respect human rights.

The perspectives and views of the communities in which Nilfisk operates are considered through the Nilfisk Double Materiality Assessment (DMA), which form our impact and risk identification process, which then leads our mitigation measures.

In the event of discrepancies between this Policy and any local corresponding legislation, Nilfisk will comply with all applicable laws and regulations while seeking solutions that are in respect of human rights and this policy.

The Human Rights Policy has been developed and structured according to the six generic steps of due diligence, based on the OECD Due Diligence Guidance for Responsible Business¹, as outlined below:

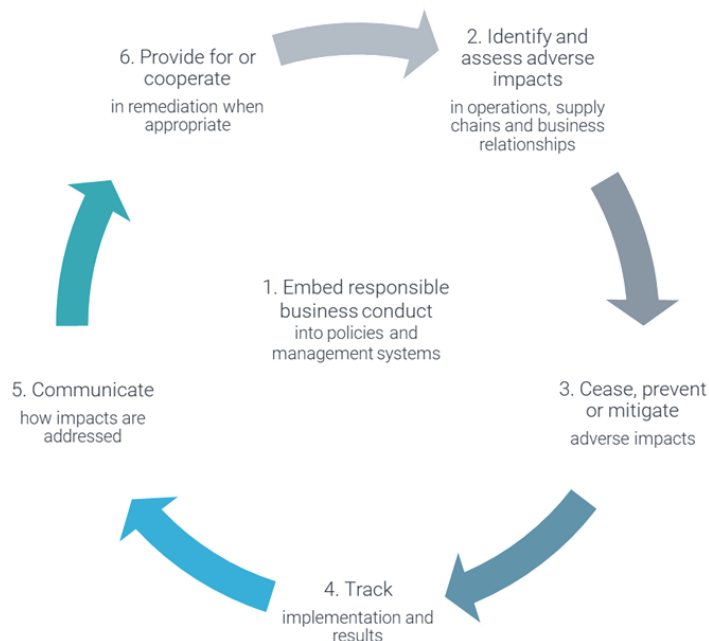


Figure 1: 6 steps of due diligence

¹ Ref.: Respect for Human Rights (the6steps.dk); <https://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>

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3. Policy Owner / Roles & Responsibilities

Fulfilling the Human Rights Policy is a responsibility shared by all Nilfisk employees, including temporary workers and consultants. The overall responsibility for the cascade of the policy lies with the Nilfisk immediate manager.

Fulfillment and oversight of the policy rests with the business functions listed below:

- Global People Organization and Culture (POC)
- Sustainability
- Compliance
- Global Quality
- Global EHS
- Strategic Sourcing

The Human Rights Policy is overseen by Nilfisk Leadership team members
 EVP, CMO Consumer, Sustainability & ESG Camilla Ramby
 EVP, Head of People, Organization & Culture Siam Schmidt

The CEO approves and holds responsibility for this policy.

Policy Owner

The Sustainability team is responsible for maintaining and updating the Human Rights Policy. This policy will **be annually** to ensure Nilfisk's compliance with international standards and to meet the expectations of our customers and stakeholders. This review process will be conducted in collaboration with People Organization and Culture (POC), the Global Compliance team, and other relevant functions to ensure alignment and integration with existing and overlapping policies.

- The Global Compliance Function owns and maintains the **Code of Conduct**, the **Supplier Code of Conduct**, **Nilfisk Statement related to the UK Modern Slavery Act** and the **Whistleblower Policy**. The Code of Conduct (CoC) addresses material human rights issues pertinent to Nilfisk.
- People Organization & Culture owns and maintains the **Diversity, Equity & Inclusion Policy** (DE&I), which also intersects with this policy.
- The Global EHS organization owns and maintains the **Health & Safety Manual** and the **Customer Health & Safety Policy** is the responsibility of the global quality department.
- The **DMA playbook** is owned by the financial reporting and controlling team with the Sustainability team leading the social impact assessment.

4. Commitment to respect Human Rights

As a globally active company, we recognize our corporate responsibility to respect human rights. We are committed to upholding human rights in our own business activities, actively enforcing these standards within our global supply chains, and providing access to remedies for those affected by human rights

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violations. Our policy and actions reflect and adhere to internationally recognized human rights standards as outlined below:

We are committed to respecting all human rights recognized in the following international standards:

- The UN Guiding Principles on Business and Human Rights (UNGPRH).
- International Labour Organization’s (ILO) Declaration on the fundamental Principles and Rights at Work²
- UN Global Compact’s ten guiding principles.
- The International Bill of Human Rights³
- OECD Due Diligence Guidance for Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Supply Chains of minerals from conflict-affected and high-risk areas

Wherever we operate, we strive to implement processes to identify, prevent, and mitigate potential adverse human rights impacts.

We recognize that in some places where we operate, laws against corruption or discrimination may be weak, or rarely enforced, and that standards of health, safety, and environmental protection may be rudimentary. Nilfisk commits to influence our business partners through training and mitigating actions to improve the overall human rights performance.

If Nilfisk determines to have caused or contributed to an adverse human rights impact, we will take appropriate measures to mitigate the effect based on our level of involvement. If we are directly linked to an adverse impact through our activities, we will leverage our influence with business partners to prevent or mitigate further impacts. The Nilfisk Whistleblower System is one mechanism available to report willful or negligent actions that are in direct violation of human rights, such as diversity and non-discrimination, freedom of organization, child labor, forced labor, and health and safety⁴.

Fundamental employee rights are rooted in human rights, and we thus closely examine the conditions of individuals in the workplace. Our due diligence processes prioritize the human rights aspects outlined below, which we have identified as potential high-risk areas.

Salient Human Rights

1. Child labor
2. Community rights
3. Discrimination and harassment
4. Forced labor (incl trafficking)

² Includes freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labor, the effective abolition of child labor, the elimination of discrimination in respect of employment and occupation; and a safe and healthy working environment

³ [OHCHR | International Bill of Human Rights](#)

⁴ Quote from the Nilfisk Whistleblower policy

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5. Freedom of association and collective bargaining
6. Freedom of expression
7. Gender discrimination
8. Human rights and security
9. Land rights
10. Rights of indigenous peoples
11. Tax, anti-corruption and human rights
12. Wages
13. Water and sanitation
14. Working hours

Material topics are determined in the annual DMA process. Based on the salience principle, all salient human rights impacts are material to Nilfisk from an impact perspective.

Nilfisk's Commitment to Human Rights for Own Operation & Value Chain workers

Fundamental employee rights are rooted in human rights, and we thus closely examine the conditions of individuals in the workplace. Our due diligence processes prioritize the human rights aspects outlined below, which we have identified as material topics for Nilfisk. Our efforts are concentrated on, but not limited to, our own employees, employees of direct suppliers, and the communities surrounding our sites.

The highest risk of impact on our own workers & our value chain workers are:

- Workers (Own Operation & Value Chain workers) directly involved in the production processes, workers working with hazardous substances, workers in the industry of warehouse operations and distribution
- Workers in the Nilfisk value chain involved in the extraction of metals or minerals (product sourcing categories: Batteries & Electronics)
- Migrant workers in our own operation as well as for our value chain, particularly for the geographical local of China and Mexico

Material topics include:

- Adequate wages
- Working hours
- Right to health and safety at work
- Prohibition of child labor, forced labor, slavery, and human trafficking
- Training and skills development
- Social dialogue
- Equal opportunities and protection against discrimination and harassment
- Freedom of association, right to collective bargaining and strike, and social dialogue

5. Key Stakeholders

To identify human rights risks and develop mitigation measures, we proactively and regularly engage with our stakeholders, including affected rightsholders and / or their legitimate representatives.

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Our key stakeholder groups include own employees, including temporary workers and consultants, employees in our value chain, including workers in warehouse operations and logistics partners, our customers and end users.

Engaging with workers in own operation

We respect the human rights of our employees and develop policies and training, that will allow them to thrive in the workplace. All employees are required to complete the Nilfisk **Code of Conduct** training available on Nilfisk University, or training specifically developed for workers in our manufacturing sites, to ensure their understanding of our commitments.

Nilfisk is committed to maintaining a safe workplace for our employees, and we have developed a Health and Safety manual to reduce or eliminate workplace hazards.

Diversity, Equity and Inclusion is an essential part of Nilfisk, and we have a D, E & I policy and mandatory training in Nilfisk University for all managers. We embrace differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

We respect our employees' right to freedom of association and to engage in collective bargaining.

We have policies, processes and training in place (ref sec 1 Policy objectives), to embed human rights considerations into relevant business decisions. Our key tools incl. guidance on priority of our work is:

- DMA assessment (Own workforce)
- Nilfisk Voice, employee engagement (Own workforce receives questionnaire twice a year)
- Internal and external audits (ISO45001)
- 3rd party sustainability audits (Sedex) of our manufacturing sites

If an employee (including temporary workers and consultants) feels violated, or a violation is observed, reporting a violation can be done through several channels, such as own direct manager, HR business partner, directly to the global compliance team or through the whistleblower system.

Engaging with value chain workers and communities

Nilfisk has a responsibility to respect the human rights of the people in our value chain.

Our responsibility also extends to the people that contribute to our business in other ways, such as logistics and warehouse operations and other indirect suppliers, as well as our customers and end-users

We have a responsibility to respect the human rights of the people that live in the communities that we impact. We strive to improve the quality of life.

We have outlined our human rights commitment and expectations for all suppliers in our Supplier Code of Conduct, which is part of the contractual obligations with our business partners.

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Our key tools for value chain engagement:

- DMA assessment (Value chain workers)
- Nilfisk site audits (on-site and online)
- 3rd party sustainability audits (Sedex), employee interviews are part of assessment
- Sustainability Questionnaire for new and high-risk suppliers (direct and indirect suppliers)
- Screening tools (Dun & Bradstreet, Social, Corruption & Environment)
- Danish Chamber of Commerce (i.e. China, direct dialogue, and Webinars to understand risk of local operation)
- Rambøll Consulting (risk mapping of country & sector)

6. Risk Assessment

Nilfisk assesses risks with regards to negative impacts on human rights, through several channels within our own operation as well as our value chain. High level risk assessment and mitigation at corporate level:

- **Double materiality assessment:** The Nilfisk materiality assessment covers all human rights-related issues including salient human rights issues relating to forced and compulsory labor, diversity and equal opportunities, anti-corruption and ethical behavior and other human rights impacts (ref. 4. Commitment to Respect human rights). The double materiality assessment serves as the overarching process to identify negative impacts relating to human rights issues. Stakeholders across Nilfisk operations representing internal and external stakeholders are included in the risk identification and scoring process.
- **Enterprise risk assessment:** The overall objective of risk management is to support the realization of Nilfisk's strategy and support our operational and financial objectives, ensuring that risks are properly identified and mitigated. We use an integrated risk management framework to identify, assess, manage, monitor and communicate risks across the company. Nilfisk reports on the top-5 identified risks in its annual report, but to date Human Rights-related risks have not been ranked in the top 5 reported risks.
- **Quality risk assessment:** Through this assessment, Nilfisk identifies external and internal relevant issues that could represent risks and opportunities to Nilfisk, relating to the QMS (Quality Management System), OHS (Occupational Health & Safety) and EMS (Environment Management System). The risk register is updated annually with risks and mitigating activities, as part of our ISO management system
- **Internal compliance audit of own activities:** Legal compliance audits are conducted by Nilfisk's Compliance team and framed by a Standard Operating Procedure (OTH-1-COM0759 Internal compliance site visits) to check Nilfisk compliance with its Code of Conduct. Locations are selected

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based on various factors including the Transparency International Annual Corruption Perception Index and empirical compliance information about a Nilfisk entity (e.g., reports of compliance violations or of risks that the entity faces).

- **External (independent) audit of own activities:** Nilfisk has implemented Sedex audits (SMETA 4 pillar audits) of its manufacturing sites (2024)
- **Whistleblower system:** Nilfisk whistleblower system allows employees and external stakeholders to report non-compliance with the principles stated in Nilfisk Code of Conduct and the Nilfisk Supplier Code of Conduct, including potential human rights impacts. Nilfisk also receives reports on these issues through internal reporting and through direct contact from individuals, e.g., by e-mail.

Suppliers-specific risk assessment channels:

- **On-site audits of suppliers:** Nilfisk’s Compliance team visits Nilfisk suppliers to check their compliance with the Supplier Code of Conduct rules and applicable global standards. The list of targeted suppliers is defined by the Compliance team based on annual turnover, business situation with Nilfisk and location of the suppliers.
- **External Supplier Audits:** Nilfisk has implemented Sedex SMETA 4 pillar audits on identified high risk suppliers.
- **CSR, compliance and regulatory questionnaire:** Nilfisk sends a questionnaire to prospective suppliers with whom Nilfisk signs a new contract or renews a contract. Completing the questionnaire is a mandatory step in the supplier’s approval procedure, requiring supplier responses regarding environment, health and safety, labor and human rights, product safety and quality, and a broad range of business ethics.
- **Screening tool:** For the Nilfisk direct and indirect suppliers we use an external screening tool (Dun & Bradstreet) to screen for legal compliance, reputational risks, anti-corruption, competition laws, trade sanctions & environmental protection.

7. Communication

This Policy will be available on Nilfisk’s website and communicated on Nilfisk World as well as anchored in the Quality Management System of Nilfisk.

Moreover, it will be communicated to our suppliers, old and new ones, as a matter of ensuring that they are aware of the Nilfisk standards for Human Rights.

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8. Revision Log

Section	Rev	Description of Change	Review date	Reviewed by:	Approve date	Approved by:
All	01	Original Release (Initial Version)	20 Dec 2022	Betina Lougart	15 Dec 2022	Joseph Simon / Siam Schmidt/ Camilla Ramby / Peter Tanzer
All	02		Nov 2024	Betina Lougart, Malene Thiele	5 Dec 2024	Camilla Ramby / Siam Schmidt

9. Appendix: Related Nilfisk Policies

This policy is aligned with the Nilfisk

- **Code of Conduct**
<https://documents.nilfisk.com/Nilfisk/Nilfisk/INT/corporate/csr/nilfisk-code-of-conduct/>
- **Supplier Code of Conduct**
<https://documents.nilfisk.com/Nilfisk/Nilfisk/global/supplier-code-of-conduct/>
- **Whistleblower Policy**
<https://nilfisk.whistleblownetwork.net/app-page;appPageName=Whistleblower%20policy>
- **Statement on UK Modern Slavery Act**
<https://www.nilfisk.com/media/ujnl33ts/nilfisk-statement-ukmsa-2024-signed.pdf>
- **Diversity, Equity and Inclusion Policy**
<https://www.nilfisk.com/media/aw5fp3fq/diversity-equity-inclusion-policy.pdf>
- **Health & Safety Manual (internal document)**
https://nilfisk.sharepoint.com/:w/r/sites/knowledge/production/Global-Quality/_layouts/15/Doc.aspx?sourcedoc=%7Be3c2298d-46a8-4576-9e96-abc62f0b1600%7D&action=default&mobileredirect=true

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- **Customer Health & Safety Policy (internal policy)**
- <https://nilfisk.sharepoint.com/sites/knowledge/production/Global-Quality/Lists/Documentation%20Management%20System/Attachments/1125/QES-0-QEM1125-01%20Customer%20Health%20and%20Safety%20Policy.pdf>
- **DMA playbook (internal document)**
[DMA playbook 2024_August 2024.docx](#)

10. Appendix: Nilfisk Value Chain

Nilfisk value chain overview.

