

GLOBAL HUMAN RIGHTS POLICY

The ethical treatment of all people and regard for human rights is core to Axilion's mission of a sustainable future for all. This Global Human Rights Policy ("**Policy**") is applicable to both our own operations and our supply chain, and includes the communities impacted by our operations and our supply chain. We take seriously our responsibility to respect human rights and expect those with whom we work with to do the same.

This Policy is the formalization of our commitment to uphold, respect, and embed human rights and the values they represent throughout our business.

Axilion supports and respects internationally recognized human rights and relevant labor and employment laws for the areas in which we operate, among these the Universal Declaration of Human Rights adopted by the United Nations in 1948 and the ILO Declaration on Fundamental Principles and Rights at Work, as as well as the UN Global Compact's ten principles.

This Policy outlines the core standards and expectations we have established for our employees, suppliers, and business partners to insure valuable human rights.

All Axilion employees and business partners working on behalf of Axilion must adhere to the following human rights principles in addition to Axilion's Code of Ethics and compliance programs. Non-Compliance with these principles can lead to disciplinary actions up to termination of employment or contract.

Human Rights Principles

Employment is Freely Chosen

Axilion prohibits compulsory labor which includes prison labor, bonded labor, military labor, slave labor, and human trafficking. Axilion forbids the use of economic pressure on individuals to perform labor or maintain employment. AXILION believes that all workers have the right to freely terminate their employment after any legally required notice.

No Inhumane Treatment

Axilion prohibits the use of threats or actual physical or psychological violence, abuse, harassment, intimidation, or coercion.

Transparency

All employees receive and sign a written employment contract in a language they can understand.

No Discrimination

Axilion respects the right of our employees to be treated with respect and dignity. Axilion has a zero-tolerance policy for discrimination or harassment in any form, against any person based on, including but not limited to, their religion, race, ethnicity, nationality, gender, sexual orientation, age or disability. Axilion supports the provision of equal opportunities to all its employees and candidates for employment.

Safe Working Conditions

Axilion is committed to eliminating Environmental, Health, Safety, and Security incidents and complying with all regulatory requirements by taking a proactive approach that empowers employees to identify at risk conditions and behaviors and to learn from them to eliminate hazards and minimize risk.

No Child Labor

Axilion strongly believes that children and young people have the right to a quality education. Axilion committed to complying with the minimum age of employment required by the laws of the countries in which we do business. We respect the rights of children and young workers. Axilion prohibits the use of child labor in our operations and supply chain. Axilion strictly follows local and national laws restricting the employment of underage workers.

Fair Wages & Benefits and Reasonable Hours

Axilion believes that employees who work a standard work week should receive wages that exceed their basic needs. AXILION also respects employees' need for life outside of work. To that end AXILION is committed to ensuring that all applicable labor and employment laws are followed, and to ensure that all working conditions, including but not limited to wages, benefits and hours of work are always respected and adhered to.

Regular Employment

Axilion follows all applicable labor and employment laws and practices and is committed to meeting our responsibilities for those working on our behalf by avoiding contracting, subcontracting, or other arrangements aimed to bypass legal and social obligations.

Corporate governance mechanism

Axilion endeavours to make a future where all persons enjoy the principles listed above. Therefore, it is our responsibility to ensure we are not complicit in human rights abuses, even when local laws do not specifically address them. To achieve this, the policy will be updated regularly, and employees will receive education, training, and communications related to these topics.

Our work to respect human rights throughout our supply chain is overseen internally by executive representatives from Supply Chain, Investor Relations, and Public Policy & Business Development. We also engage external groups on a regular basis to provide feedback on our approach to responsible sourcing.

Commitment

Axilion is committed to upholding and respecting all internationally recognized human rights and the values they represent throughout our direct operations and supply chain — including with respect to our employees, customers, shareholders, suppliers, and the communities in which we live and operate. We seek to avoid causing or contributing to actual or potential adverse human rights impacts, and we expect our suppliers to also support and promote these values in their own operations and those of their suppliers.

Assessing and addressing human rights risks is an ongoing effort that involves engaging with and incorporating input from external stakeholders of potential impact, including stakeholders impacted by our operations and our supply chain, as well as reviewing and updating our policies and procedures where necessary. With this understanding, Axilion is committed to addressing any potential adverse human rights impacts. We seek to remedy adverse impacts, track and measure our progress, and report our findings.

To achieve this, the policy will be updated regularly, and employees will receive education, training, and communications related to these topics. Any violations of the Human Rights Policy should be reported to the Axilion employee hotline:

Axilion management is committed to the Human Rights Policy and pledges to allocate the resources necessary to achieve the goals of this policy.