

Human rights policy

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Introduction

Human rights are the basic rights and freedoms to which all people are entitled. They include the conditions necessary to live with dignity, equality and respect, regardless of nationality, residence, gender, belief, or other status.

Purpose

Cambi recognises that business activities and business relationships may affect the rights of individuals and communities. Human rights are therefore treated as a core element of responsible business conduct.

The purpose of this policy is to set out Cambi's commitment to respect human rights across its operations and value chain, and to identify, prevent, mitigate, and address adverse human rights impacts that may be caused by, contributed to by, or directly linked to Cambi's activities, products, or services.

The policy is guided by the UN (United Nations) Guiding Principles on Business and Human Rights and aligned with relevant international human rights and labour standards.

Respect for human rights goes hand in hand with compliance with national law. Where local legal requirements fall short of internationally recognised human rights standards, Cambi seeks to follow the higher standard to the greatest extent possible without breaching applicable law.

Scope

The policy complements Cambi's *Code of Conduct*, *Supplier Code of Conduct*, and other relevant company policies and procedures. It applies to all Cambi entities worldwide, including subsidiaries and joint ventures where Cambi has management control. It covers all business units, functions, and operations.

The policy applies to all employees regardless of role, seniority, location, or contract type. It covers directors, officers and other representatives acting on Cambi's behalf. Coverage includes permanent and temporary employees, apprentices, trainees, interns and agency staff.

The expectations set out in the policy also extend to Cambi's value chain. Suppliers, contractors, consultants, agents, distributors, controlled joint ventures and other business partners whose activities are directly linked to Cambi's operations, products, or services are expected to respect equivalent principles. In joint ventures where Cambi does not have control, equivalent standards are promoted through dialogue, contractual expectations where appropriate, and influence.

The policy applies in all countries where Cambi operates, including high-risk and conflict-affected contexts. Particular attention is given to subcontracted and agency labour, project sites, manufacturing activities, supply chains, and outsourced services where the risk of adverse impacts may be higher.

Commitments

Cambi is committed to respecting internationally recognised human rights in all operations and business relationships. Specifically, Cambi will:

1. Prohibit child labour, forced labour, bonded labour, prison labour where abusive, modern slavery and human trafficking
2. Respect labour rights, including freedom of association, collective bargaining, fair recruitment, fair remuneration, lawful working hours, rest, and decent working conditions

3. Promote dignity, equality, diversity, and inclusion, and prohibit discrimination, harassment, bullying, and degrading treatment
4. Respect privacy and protect personal data, in line with applicable legal requirements
5. Pay particular attention to individuals and groups who may be more vulnerable to adverse impacts, including children, young workers, women, migrant workers, minorities, indigenous peoples, and persons with disabilities
6. Embed human rights expectations into procurement, contracting, supplier management, and other business relationships
7. Provide access to effective, confidential, and non-retaliatory grievance mechanisms and provide for or cooperate in remediation where Cambi has caused or contributed to an adverse human rights impact
8. Monitor implementation and review performance in line with applicable requirements and stakeholder expectations

Standards and governance

Standards and legal basis

Cambi's human rights approach is informed by relevant international, regional, and national frameworks, including the following:

International human rights instruments

- Universal Declaration of Human Rights (UDHR)
- International Covenant on Civil and Political Rights (ICCPR)
- International Covenant on Economic, Social and Cultural Rights (ICESCR)
- International Bill of Human Rights (UDHR, ICCPR, ICESCR together)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Voluntary Principles on Security and Human Rights

Labour rights conventions

- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- ILO core conventions on freedom of association and collective bargaining, elimination of forced labour, abolition of child labour, and elimination of discrimination in employment and occupation
- ILO Maritime Labour Convention

Responsible business conduct frameworks

- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Business Conduct
- UN Global Compact (UNGC) – Ten Principles
- UN Sustainable Development Goals (SDGs), in particular Goals 8 (Decent Work and Economic Growth), 10 (Reduced Inequalities), 12 (Responsible Consumption and Production) and 16 (Peace, Justice and Strong Institutions)

Rights of vulnerable groups

- UN Convention on the Rights of the Child (UNCRC)
- Children's Rights and Business Principles – developed by the United Nations Children's Fund (UNICEF), the UNGC and Save the Children

- UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- UN Declaration on the Rights of Indigenous Peoples and ILO Convention 169 on Indigenous and Tribal Peoples
- International humanitarian law in conflict-affected areas

Regional frameworks

- European Convention on Human Rights (ECHR)
- Charter of Fundamental Rights of the European Union

National legislation and requirements

- Norwegian Transparency Act (2021)
- UK Modern Slavery Act (2015)
- Other applicable laws and regulations in the countries where Cambi operates

Cambi monitors developments in applicable due diligence and human rights legislation, including EU and Norwegian requirements, and updates its approach as needed. At the date of approval of this policy, Cambi is not understood to be directly in scope of the EU Corporate Sustainability Due Diligence Directive.

The list above is not exhaustive.

Governance and accountability

Human rights responsibilities are integrated across the organisation:

- **Board of Directors** – approves the policy and oversees integration of human rights into corporate strategy and material compliance processes. The Board also approves the annual sustainability reporting that includes relevant statutory disclosures, including the due diligence account under the Norwegian Transparency Act and the statement under the UK Modern Slavery Act. These are published at least annually alongside the annual report and no later than 30 June.
- **Senior management** – responsible for implementation of the policy, establishment of governance structures, allocation of resources, and integration of human rights into risk management, procurement, operations, project execution, and business development.
- **Sustainability function** – coordinates Cambi's human rights work, supports implementation, provides guidance and tools, and prepares internal and external reporting.
- **Managers** – responsible for applying the policy in daily operations, ensuring that employees understand their responsibilities, and identifying and addressing human rights risks within their areas of responsibility.
- **Employees** – expected to comply with the policy, complete relevant training, and raise concerns where human rights may not be respected.
- **Business partners** – including suppliers, contractors, and consultants are expected to align with the policy and with related requirements set out in procurement processes, supplier standards and contracts.

Human rights due diligence

Cambi carries out human rights due diligence in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct.

Human rights due diligence is treated as an ongoing process and is integrated into corporate governance, enterprise risk management, procurement, project development, quality systems, and health, safety, and environment (HSE) processes.

The process includes the following steps:

1. Identify and assess risks and impacts

Cambi identifies and assesses actual and potential human rights risks across operations and relevant parts of the full value chain, including at the site, supplier, and project levels.

Assessments may include country risk, sector risk, labour practices, subcontracted and agency work, raw material sourcing, outsourced services, technology and data-related impacts, and foreseeable impacts linked to the use of products and services.

Assessments consider severity, likelihood, Cambi's degree of involvement and influence, patterns from past incidents, grievance data, stakeholder input, self-assessments, and relevant external information sources. Risk assessments are refreshed regularly and whenever significant changes occur, related to mergers and acquisitions, projects, geographies, or regulatory environments.

2. Prioritise salient issues

Risks are prioritised by severity and likelihood, with a focus on those that may cause the greatest harm to people. In determining priority, Cambi considers scale, scope and irremediability, as well as the company's ability to prevent or mitigate harm through direct action or leverage.

Salient risks receive prioritised management attention, follow-up and resourcing. Lower-level risks are also addressed in proportion to their significance.

3. Integrate findings and act

Findings from due diligence are integrated into relevant decision-making and control processes. Measures may include stronger contractual control, supplier engagement, corrective action plans, site-specific safeguards, additional supervision, training, escalation, or changes to sourcing and operational practices.

4. Track effectiveness

Cambi monitors the effectiveness of preventive and mitigating measures through relevant qualitative and quantitative indicators, follow-up activities, management review, and grievance data. Where measures are not effective, the approach is revised and strengthened.

5. Engage stakeholders

Cambi communicates on human rights issues in an open, fact-based, honest, and respectful manner, and engages openly with stakeholders who may be affected by operations or supply chains, including employees, communities, suppliers, investors and civil society. Engagement is conducted in good faith, in culturally appropriate ways, and with particular attention to vulnerable groups and human rights defenders. Stakeholder perspectives are considered in risk assessments, mitigation measures and evaluation of outcomes.

6. Communicate

Cambi explains how human rights risks are managed and the actions taken to address them. Communication should be accurate, balanced and sufficiently specific to reflect material risks, the actions taken, and the progress achieved. The company receives information requests at transparency@cambi.com and processes them within the statutory timeframes.

7. Provide for or support remediation

Cambi ensures access to effective grievance mechanisms and fair remediation. Details are described in the dedicated chapter.

Employment and workplace rights

Non-discrimination, equal opportunity, and inclusion

Cambi is committed to a workplace and value chain founded on dignity, equality, and respect, recognising that each person has different circumstances and freedom of conscience, thought, opinion, and expression.

Harassment, bullying, intimidation, humiliation and degrading treatment are not accepted. Concerns relating to such conduct must be addressed promptly and fairly. Managers are required to foster a culture of inclusion and respect.

Discrimination is prohibited in recruitment, remuneration, access to social security and benefits, job assignments, promotion, personal development, training, discipline, and termination, including retirement.

Decisions in all employment processes must be based on objective and relevant considerations, such as qualifications, skills, performance, and experience, and must not be influenced by bias or stereotyping.

Equal treatment must be ensured regardless of gender, age, ethnicity, skin colour, religion or belief, sexual orientation, disability, social origin, caste, marital status, family or carer responsibilities, trade union membership, veteran status, genetic information, political opinion, or other protected characteristic under applicable law.

Cambi may use lawful and proportionate positive action to remove barriers and achieve substantive equality, while employment, remuneration and promotion remain merit-based.

Wages, working hours, and benefits

Cambi ensures that wages, benefits, and working hours comply with applicable laws, collective agreements, and relevant international standards. Employees are entitled to fair remuneration that allows them to maintain a decent standard of living.

Wages are paid regularly and on time, with no unlawful deductions. Working hours, overtime, rest periods, and paid leave must meet or exceed legal requirements.

Employees are entitled to reasonable working hours and to adequate rest and leisure. They cannot be forced or threatened to perform work outside normal working hours. Overtime as a substitute for insufficient regular salary is prohibited.

Cambi provides fair and competitive benefits, in line with local requirements and company policies.

Health, safety, and security

Protecting health, safety and security is a fundamental part of respecting human rights. Cambi is committed to providing adequate working conditions for all employees, contractors and others working on sites and projects. Working environments must be safe, clean, and appropriate for the tasks performed, with hazards identified, assessed, and managed through proper controls, training, supervision and protective measures.

No one must be exposed to violence, intimidation or other unsafe conduct in connection with work. Any such incident or concern must be reported immediately and will be addressed without delay.

Security measures must be designed and implemented in accordance with human rights. Security personnel must act lawfully, with restraint and proportionality, and with respect for the dignity of all individuals. Private or public security providers must follow recognised good practice, including the Voluntary Principles on Security and Human Rights.

Operations in conflict-affected or unstable areas may expose employees, contractors, and communities to elevated security risks. Cambi will not pursue or continue projects where employee safety and security cannot be reasonably assured. Decisions are guided by thorough risk assessments that prioritise the protection of people above all other considerations.

Cambi works systematically to prevent accidents, injuries, and occupational illnesses, and to promote physical and mental well-being. The human rights policy should be read alongside the company's **health and safety** policy.

Decent working conditions

Cambi ensures that all employees have decent working conditions that support dignity and well-being as well as physical safety. Employees are entitled to adequate workplaces and facilities, including access to potable water, sanitation, and rest areas. Where accommodation is provided through work arrangements, including project assignments or business travel, basic safety, hygiene, privacy, and dignity standards must be met.

Special protections are afforded to employees in situations requiring additional safeguards. Pregnant and nursing employees must not be required to perform work that is harmful to their health or to their child's health, and they are protected from discrimination based on maternity or nursing. Employees returning from maternity leave are reinstated in the same or an equivalent position with no reduction in pay or benefits.

Job security is protected by ensuring that employment is not terminated arbitrarily. Any dismissal must be based on objective grounds, follow lawful procedures, and respect applicable notice periods.

Cambi also supports employee development by providing access to training and learning opportunities relevant to roles and responsibilities.

Freedom of association and collective bargaining

Cambi respects the rights of all employees to freedom of association and collective bargaining. Employees may join trade unions, worker councils, or other representative organisations of their own choosing, and they also have the right to refrain from such activities without facing discrimination. In Norway, employees may elect employee representatives to the Board in accordance with applicable law and company arrangements.

Employees and worker representatives must be able to raise workplace issues without intimidation, retaliation, or interference. The company is committed to engaging in good-faith dialogue with employees and their chosen representatives.

Where national law restricts the right to freedom of association or collective bargaining, Cambi supports lawful and effective means of worker representation, consultation, and dialogue.

Forced labour, modern slavery, and human trafficking

Cambi prohibits all forms of forced, bonded, indentured, or involuntary labour. Employment must always be freely chosen. Workers must not be subject to debt bondage, coercion, threats, wage withholding, document withholding, or restrictions on freedom of movement.

There is **zero tolerance for modern slavery and human trafficking** in operations and supply chains. Recruitment, harbouring, movement, or control of persons through coercion,

abduction, threats, intimidation, deception, abuse of power, or other exploitative means is prohibited.

Recruitment practices must follow international standards and national laws. Cambi requires that:

- No worker pays recruitment fees or related costs to obtain employment
- Contracts are provided in a language the worker understands, before deployment or commencement of work
- Workers retain control of their identity papers, passports, and other documents
- Workers are free to leave employment with lawful and reasonable notice

Child labour and young workers

Cambi strictly prohibits the use of child labour in any part of its operations or value chain.

The minimum age is set in accordance with the International Labour Organisation (ILO) Convention 138 on Minimum Age, national law, and the age for completion of compulsory education, and in no case below 15. No person under 18 may be employed in hazardous or night work or in work likely to harm health, safety, morals or schooling. Recruitment processes must include reliable age verification.

Where a case of child labour is identified, Cambi acts in line with the best interests of the child. Corrective actions must protect the child from further harm and support access to education or other appropriate remedies, such as continued income support for a defined period or alternative non-hazardous employment opportunities when legally appropriate, rather than simply terminating work without considering the consequences.

Cambi recognises the role of work-based learning and apprenticeships. Young workers of legal minimum age may be employed under appropriate conditions, provided that health, safety, development, and education are not compromised. Their working hours, tasks, and rest periods must reflect the stricter protections that apply to their age group.

Recruitment and labour practices

Recruitment, hiring, and migrant worker safeguards

Recruitment must be fair, transparent and based on qualifications, skills and experience.

No recruitment fees or related costs may be charged to workers. No worker may be required to surrender passports, identity documents, or other personal papers. Each worker must receive a written employment contract or equivalent employment documentation that sets out the material terms and conditions in a language they can clearly understand. Workers must remain free to leave employment subject to lawful and reasonable notice requirements.

Special attention is given to the rights of migrant workers, who may face higher risks of exploitation, abuse, or unequal treatment. Cambi requires responsible recruitment and employment practices, with attention to language barriers, dependence on intermediaries, accommodation arrangements, document retention risks, and access to grievance channels.

Labour agencies, temporary and on-site workers

Cambi recognises that workers employed through labour agencies or subcontractors may face higher risks of exploitation and poor working conditions. The company is committed to ensuring that such workers are treated fairly and with dignity.

Agency and temporary workers engaged on Cambi projects or sites must have written contracts, clear employment terms and conditions equal to those of comparable direct

employees. They must not pay recruitment fees or incur related costs to obtain work. Identity documents must remain in their possession at all times.

Responsible sourcing and business partners

Supplier and business partner requirements

Suppliers, business partners, contractors, and labour agencies providing workers, products, or services to Cambi are expected to comply with applicable labour and human rights requirements, as well as the standards set out in Cambi's Supplier Code of Conduct, procurement processes, and related contractual obligations.

They are expected to identify and manage relevant human rights risks within their own operations and, where relevant, within their supply chains.

Human rights expectations are integrated into supplier pre-qualification, tendering, contracting and relationship management. Monitoring is risk-based and proportionate to the nature of the relationship and the level of risk.

Conflict-affected and high-risk sourcing

Cambi recognises that the sourcing of raw materials, including those used in steel and in electrical and other components for the company's products, may involve risks of contributing to financing armed conflict and severe human rights violations. The company undertakes responsible sourcing in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Cambi applies heightened scrutiny to high-risk categories, including labour agencies, subcontractors working on Cambi sites, raw material suppliers, particularly of alloying elements and electronic components, and outsourced services such as cleaning, catering, security, and logistics. Heightened scrutiny may include upstream risk assessment, supplier engagement, and requests for traceability information.

Contractual enforcement and termination

Human rights requirements are reflected in Cambi's contracts with suppliers, contractors, and other business partners.

Where a business partner is found to be in breach of human rights obligations, Cambi requires corrective action within a defined timeframe. Support may be offered where improvement is feasible and credible, particularly where the business partner demonstrates a willingness to address gaps and strengthen practices.

If non-compliance is serious, repeated, or not remedied, Cambi may suspend or terminate the relationship. Any such decision takes into account the severity of the impact, the business partner's response, and the consequences for affected stakeholders.

Termination is considered a **last resort**. Wherever possible, Cambi seeks to use its leverage to drive positive change before disengagement.

Communities and environment

Respect for human rights is closely connected to responsible environmental and social practices. Cambi recognises that climate change, environmental degradation, pollution, poor waste handling, and irresponsible sourcing can affect the rights of people and communities, including rights linked to health, livelihood, dignity, and access to essential resources.

Where operations, projects, products, or business relationships may affect people beyond the workforce, transparent engagement and appropriate safeguards are expected. In relevant contexts, attention should be paid to vulnerable groups and to the cumulative effect of environmental and social impacts.

Cambi respects the rights of communities and indigenous peoples who may be affected by projects that use Cambi technology or products. Although Cambi does not ordinarily acquire or develop land as part of regular operations, project developers, customers and business partners are expected to engage affected communities respectfully and to follow recognised principles, including free, prior and informed consent where applicable.

Through Grønn Vekst, Cambi returns biosolids to land in accordance with applicable legal requirements and relevant best practice. This includes responsible product management, appropriate dialogue with farmers and other local stakeholders, and attention to the conditions under which biosolids are stored, transported, and applied. Cambi opposes illegal dumping, unauthorised disposal practices, and the application of biosolids without an appropriate legal basis or due consideration for affected stakeholders.

Relevant environmental and social risks are considered as part of broader sustainability and due diligence processes.

Cross-cutting issues

Privacy and data protection

Cambi recognises the rights to privacy and the protection of personal data as important. The company complies with applicable data protection laws, including the EU General Data Protection Regulation (GDPR) and expects equivalent standards from suppliers and business partners that process personal data on Cambi's behalf or in connection with Cambi's activities.

Training and awareness

Cambi builds awareness of human rights responsibilities through training. All employees are introduced to this policy as part of onboarding, and role-specific training is provided for functions with higher exposure to human rights risks, including procurement, project management, human resources, and health and safety.

Training content is updated regularly to reflect emerging risks, legal developments, and lessons learned from due diligence and grievance handling. Managers are responsible for ensuring that employees in their teams complete required training and understand how the policy applies in practice.

Grievance and remediation

Cambi provides channels for employees, contractors, suppliers, and external stakeholders to raise human rights concerns.

Grievance mechanisms must be legitimate, accessible, predictable, equitable, transparent, rights-compatible, and subject to continuous improvement, in line with the effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights. The purpose is to allow concerns to be raised and addressed without fear of retaliation, with due regard for confidentiality and fairness.

Cambi's **Code of Conduct** sets out how concerns may be raised and managed. Reports are expected to be investigated fairly and promptly. Outcomes should be communicated appropriately, with due regard to confidentiality, legal requirements, and the rights of all parties involved. Corrective actions should be taken when needed, and lessons learned should be used to strengthen processes and prevent recurrence.

Cambi encourages a culture of openness in which employees and partners feel safe speaking up. Non-retaliation is a strict rule. No person shall be penalised, dismissed, or otherwise disadvantaged for raising a concern in good faith or for participating in a legitimate investigation.

Where Cambi has caused or contributed to adverse human rights impacts, it provides or enables **fair remediation**. Depending on the nature of the impact, remediation may include corrective actions, reimbursements, restorations, compensation, reinstatement, or changes to processes and controls to prevent recurrence.

Where worker-paid recruitment fees or related costs are identified in the value chain, business partners are expected to reimburse workers consistent with the Employer Pays principle.

Suppliers and business partners are expected to ensure that their workers also have access to safe and effective grievance channels. Where impacts are directly linked to Cambi through business relationships, leverage is used to encourage prevention and remedy.

The policy sets out Cambi's commitments and expectations for responsible business conduct. It does not alter rights or obligations established under applicable law.

Regular review

Management reviews the policy annually and whenever significant changes in Cambi's business, operating context, or legal environment make review necessary.

Lessons learned from implementation, due diligence, grievance handling, and stakeholder engagement are used to strengthen the policy and related processes over time.

Material changes to the policy are submitted to the Board of Directors for approval. The Chief Executive Officer (CEO) is responsible for implementing the approved policy across the organisation and signs it each year to reconfirm Cambi's commitment.