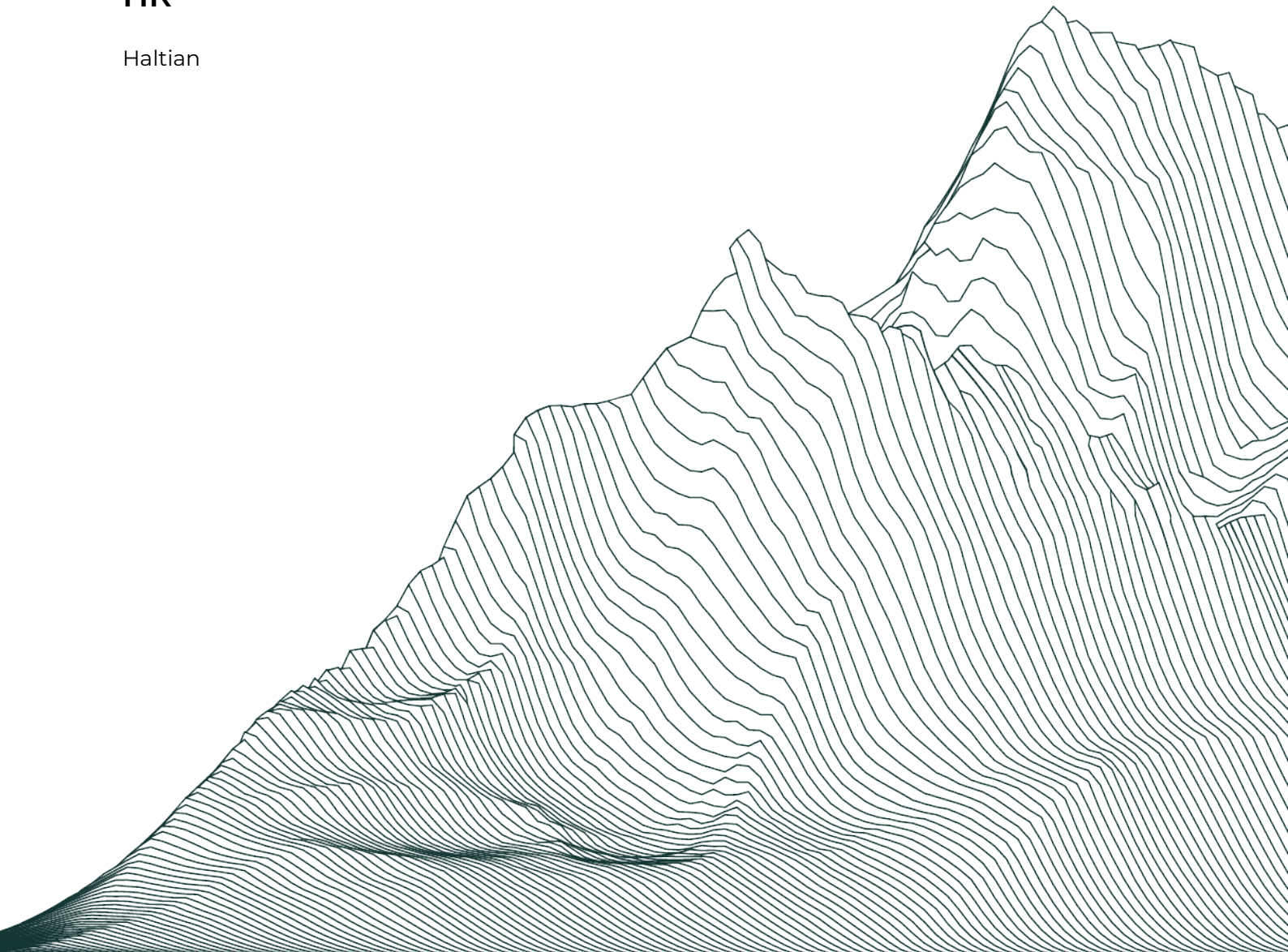


HR

Anti-Slavery and Human Trafficking Policy

HR

Haltian



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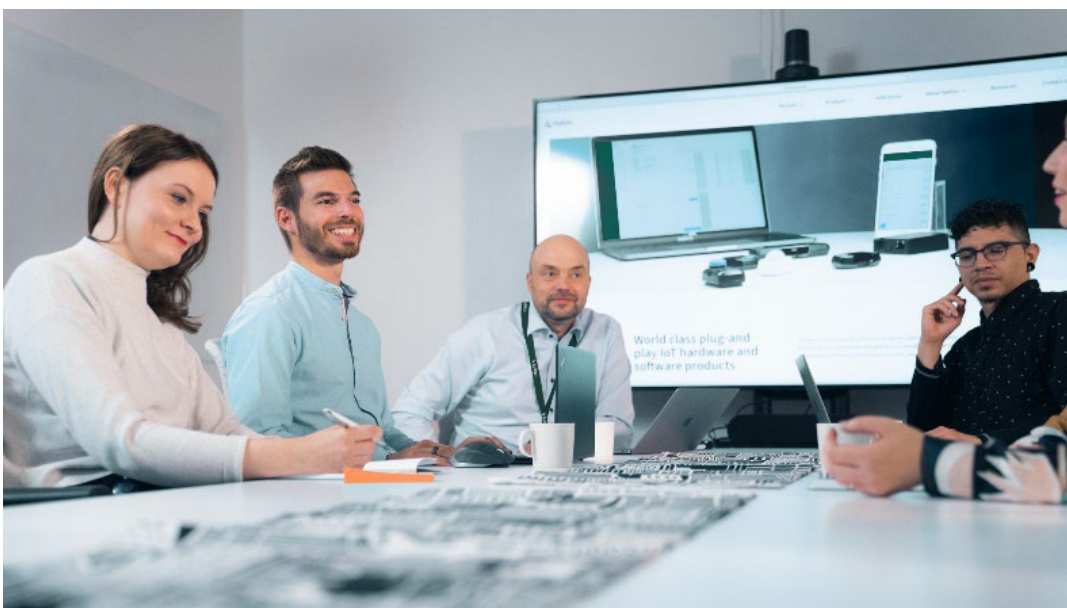
Finland Capital Area
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1. Anti-Slavery and Human Trafficking Policy

1.1. Introduction

This policy is made in accordance with the Modern Slavery Act 2015 (UK). It outlines the commitment of Haltian to preventing slavery and human trafficking. We recognize that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Haltian specializes in creating IoT (Internet of Things) solutions aimed at improving workplace efficiency and building management. Their offerings include real-time data collection for e.g. optimizing workspaces, parking, and asset tracking. They provide custom IoT solutions and product development services, leveraging their expertise to create scalable and user-friendly technology. Haltian's products, such as the Thingsee IoT platform, help businesses transition to modern, data-driven environments.



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We have zero tolerance for slavery and human trafficking in any part of our business, including our supply chains. We have a number of employment policies in place to ensure all our employees have the right to work and are paid fairly, that we act with integrity and ethically, and that we have effective measures in place to ensure slavery is not present anywhere in our business or supply chain. This includes our Equality and Diversity policy and plan, which encompasses recruitment, promotion, training, performance management and reward. Our principles of fair treatment and respect are also applied to our relationships with customers, suppliers, contractors, shareholders and other stakeholders.

1.2. Our Commitment

Haltian is committed to acting ethically and with integrity in all our business dealings and relationships. We are dedicated to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.3. Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.



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1.4. Our Approach

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 (UK). We expect our contractors, suppliers, and other business partners to adhere to the same high standards and to include specific prohibitions against the use of forced, compulsory, or trafficked labor in their operations. This expectation extends to their suppliers as well.



Informing on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business

partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

1.5. Reporting and Whistleblowing

Haltian encourages all its workers, customers, and other business partners to report any concerns related to the direct activities or the supply chains of our organization. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organization's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.

1.6. Compliance

You must ensure that you read, understand and comply with this policy.



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Failure to comply with this policy will be treated as a serious disciplinary matter and may result in action up to and including termination of employment or contract.

1.7. Review and Monitoring

This policy will be reviewed annually by the Haltian Leadership team to ensure it remains current and reflects the organization's activities and the latest legal requirements. Regular audits will be conducted to assess the effectiveness of the measures implemented.

1.8. Conclusion

Haltian is fully committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from such practices.

Approved by: Pasi Leipälä

Date: 18.6.2024



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