

# Human Rights

Policy Statement



**DANX**  
**Carousel**

# Danx Carousel Group Human Rights policy

## About the DANX Carousel Group

The DANX Carousel Group of companies (hereafter “The Group,” “We,” “Our”) is a time critical service logistics specialist with strong positions in the UK, Ireland, BeNeLux, DACH, Iberia, Nordics, Baltics and Poland.

The Group is the comprehensive partner for logistics and supply chain services such as time-critical spare parts distribution, warehousing, final mile, linehaul, battery logistics, customs clearance, and more. The Group consists of DANX, DANX ILS, UT, TBS, Fomab, TLS Group, Carousel, Alltrans, Logik International Logistics and LPR.

Our values encompass our commitment to Caring, Learning and Ownership and these are embedded in our everyday work.

We support



### 10 principles of the UN GLOBAL COMPACT

#### HUMAN RIGHTS

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses.

#### LABOUR

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** the elimination of all forms of forced and compulsory labour;

**Principle 5:** the effective abolition of child labour; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation.

#### ENVIRONMENT

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

#### ANTI-CORRUPTION

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

### International Labour Organisation

#### ILO Declaration of Fundamental Principles and Rights at Work:

- (1) Freedom of association and the effective recognition of the right to collective bargaining;
- (2) The elimination of all forms of forced or compulsory labour;
- (3) The effective abolition of child labour; and
- (4) The elimination of discrimination in respect of employment and occupation.

### SUSTAINABLE DEVELOPMENT GOALS



Goal 3 – Good health and wellbeing



Goal 11 – Sustainable Cities and Communities



Goal 4 – Quality education



Goal 13 – Climate Action



Goal 5 – Gender equality



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## Scope of Policy

The scope of the **Human Rights policy** applies to all stakeholder groups including both upstream and downstream within the value chain, including management; employees; contract workers; suppliers and partners of all entities in the Group as well as for subsidiary companies owned and operated by the DANX Carousel Group across our geographies and countries and the wider communities in which it operates and through which material impacts, risks or opportunities relate.

This content outlines the DanxCarousel Groups position on reporting and transparency in-line with national and international law; Principle 1. and Principle 2. of the UN guidelines; the ILO Declaration on Fundamental Principles and Rights at Work and regulatory requirements along with the OECD Guidelines for Multinational Enterprises. The content of this policy outlines; how to report, Infringements and consequences of such breaches; our commitment to training and awareness of its content along with the Groups transparency of reporting and monitoring of this policy.

We expect our suppliers and contractors to share our regard and respect of this policy, and this is reflected in our Supplier Code of Conduct which can be found on our websites:

<https://www.danxcarousel.com>, Nordics: <https://www.danx.com/> and for Western Europe: <https://www.carousel.eu/en/>

## Our Commitment

The DANX Carousel Group is committed to meeting its responsibility and to gain insights into its stakeholders with respect to **Human Rights** as defined and adopted from Principle 1, and Principle 2 of UN Guiding Principles; the ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.

We are committed to an unbiased dialogue and to enforce these principles in the areas of **Human Rights** across our employees and the wider community of stakeholders and partners through which it operates.

# Danx Carousel Group Human Rights policy

## Aims of the Human Rights policy

The aim of this policy is to:

- **prevent and detect** any forms of infringements of Human Rights of any kind within its business and across its stakeholders.
- provide **awareness, guidance and training** to all relevant internal and external stakeholders on appropriate behavior when it comes to this policy.
- provide a **breach response mechanism** to provide an open and unbiased dialogue with all stakeholders on Anti-bribery and corruption.
- ensure compliance and regard to all relevant national and international laws, governance and regulatory requirements regarding Human Rights.
- Monitor and report any breaches of this policy.

Integrity and transparency are of fundamental importance to our business, and we uphold a zero-tolerance attitude towards any form of Human Rights activities of any kind, whether committed by employees or by third parties acting for or on behalf of the Group.

### a) Diversity, Equity and Inclusion

DANX Carousel Group rejects any form of discrimination or harassment and aims to create an inclusive work environment for all its stakeholders, that values equal access to opportunity regardless of social identity; and employment related decisions – from hiring to termination and retirement – based solely on lawful, non-discriminatory criteria such as performance and potential, qualifications and experience.

The Group aspires to promote a positive and inclusive work environment that values the diversity, equity and inclusion of its employees and wider stakeholder community with which it works and shall not discriminate or tolerate discrimination with respect to distinguishing characteristics such as race, colour, gender, religion, political or other opinion, national or social origin, sexual orientation, age or disability. We expect our partners with whom we work to hold the same regard for this as reflected in our Supplier Code of Conduct and our Diversity, Equity and Inclusion Policy.

### b) Forced Labour

The Group does not tolerate and rejects any form of forced and compulsory labour, including bonded labour, indentured labour, slave labour, or human trafficking. Workers must be allowed to move around freely and leave their place of work when their working hours end. We expect our suppliers to hold the same regard for this as reflected in our Supplier Code of Conduct.

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### **c) Child Labour**

The Group does not tolerate the hiring of child labour under any circumstances. All legal restrictions regarding the employment of persons below the age of 18 must be observed. Younger workers may be employed through Company-approved, short-term internships, apprenticeships or work experience programmes, but they are never permitted to do work that may threaten their health & safety or hinder their education. We expect our suppliers to hold the same regard for this as reflected in our Supplier Code of Conduct.

### **d) Freedom of Association and Collective Bargaining**

The Group respects employees' rights to form or join a labour union or other organisation of their choice, and to bargain collectively in support of their mutual interests, allowing freedom of expression and association without fear of punitive actions such as intimidation, harassment or termination of employment.

### **e) Harassment**

The Group is committed to treating every employee and stakeholder with dignity and respect, and to promoting equal opportunities. Harassment is any improper or unwelcome conduct that might reasonably be expected or be perceived to cause offense or humiliation to another person. Harassment in any form because of gender, gender identity and expression, sexual orientation, physical ability, physical appearance, ethnicity, race, national origin, political affiliation, age, religion, or any other reason is prohibited at DANX Carousel Group.

### **f) Working Hours, Benefits and Fair Wages**

The Group will adhere to the applicable nation and international laws or industry standards relating to working hours, benefits, and fair wages.

We ensure that all employees are paid in a timely manner and clearly convey the basis on which workers are being paid. All employees have the right to sick leave and annual holiday, as well as parental leave, as provided by national legislation, for those employees who have to care for a new-born or newly adopted child. Employees who take such leave must not, as a result of taking such leave, face dismissal or threat of dismissal. Employees shall be provided with written and understandable information about their employment conditions, and about the particulars of their salaries. We promote a healthy work/life balance. Employees must be entitled to at least one day off in seven and must be given reasonable breaks in work and sufficient rest periods between shifts.

In continuation of our company values, the DANX Carousel Group is committed to continuously developing employee skills and capabilities through equal access to learning opportunities, and to providing opportunities for career advancement where possible.

In the event of major layoffs or redundancies, the DANX Carousel Group must, as a minimum, satisfy applicable local laws and industry standards.

We expect our suppliers to hold the same regard for this as reflected in our Supplier Code of Conduct.

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### g) Occupational Health & Safety

The DANX Carousel Group recognises that it has responsibilities for the health and safety, as reflected in the Group Health & Safety Policy, which outlines the rights of its workforce whilst at work and those rights of other stakeholders who could be affected by its work activities.

The health & safety of our employees and our wider community of stakeholders always comes first and our objective throughout the Group, is that we want everyone to return home safely every day, and we believe accidents and incidents are preventable.

The Group strive to implement the standards of occupational health & safety at the highest level by applying a health and safety risk management best practice approach appropriate for the business.

DANX Carousel shall comply with its legal obligations, applicable occupational health & safety regulations, and national legislation, to provide a work environment that is safe and conducive to good health, in order to preserve the health of employees, safeguard third parties and prevent accidents, injuries and work-related illnesses. This includes regular workplace risk assessments, implementation of adequate hazard controls and precautionary measures, along with adequate and appropriate employee education and training in health and safety issues. Alongside our commitment to health & safety, we aim for continuous improvement in our health & safety performance and management through regular reviews and the implementation of best practice to achieve our safety objective.

### h) Data Privacy, Protection, Security and Disclosure of Information

The Group shall adhere to relevant data protection and security laws as well as to respective regulations, regarding personal data of customers, consumers, employees, and shareholders reflected in the groups Data Privacy Policy. The Group shall comply with all said requirements when personal data is collected, processed, transmitted, or used in accordance with the Data Privacy policy which outlines our position on data protection, securing and disclosure of Information.

The Group shall safeguard and make only appropriate use of confidential information. The Group shall not disclose any information that is not known to the public.

We expect our suppliers to hold the same regard for this as reflected in our Supplier Code of Conduct.

## Monitoring Breaches

The Group is committed to identifying potential and actual adverse impacts that this policy and our conduct of business may cause or contribute to, and strives to recognise and record through targets, to prevent such impacts, and mitigate or remedy using action plans.

## Consequences of Breach and Infringements



## Danx Carousel Group Human Rights policy

Whilst we appreciate that there may be some differences in applicable national laws versus international laws, we apply our policies across all relevant stakeholders and we will adhere to the national and international laws as a minimum and respect the guiding principles of the UN Global compact, ILO (International Labour Organisation) and any other interested regulatory bodies that are applicable to the work that we carry out. If we receive any reported infringements, we will act appropriately for clarification and will take appropriate corrective actions.

If we suspect that anyone working for or on behalf of the DANX Carousel Group has committed a breach of this policy, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken which may result in dismissal, or in the case of a supplier/partner action up to and including termination of contract. In some circumstances, under relevant law, the Group may be legally required to share details with such authorities, and we will always comply with such requirements. The outlined topics within this policy are significant for the way we commit to and govern our conduct throughout our business.

### Raising concerns

Any employee with concerns may raise these through our employee mechanisms for raising workplace-related grievances. We encourage employees who have a concern to talk in the first instance to their line manager, or alternatively to raise their concern with their HR or compliance representatives. If none of these options is possible, the DANX Carousel Groups whistle blower system enables all stakeholders whether they be internal and external stakeholders, or members of the public to speak up about violations in relation to this policy without fear of retaliation.

We will support all who report violations as well as those who request assistance or have concerns. If any concerns or illegal or unethical business behaviour is suspected or detected, you can report it to us via our whistle-blower system. Our whistle blower system Safe2Whistle can be accessed here: <https://report.whistleb.com/en/danxcarouselgroup>. It is operated across the business by an independent third party (Bech.Brunn) appointed by the DANX Carousel Group. All issues raised through the Whistle Blower system are monitored by the third party and the Group whistle blower team. Reporting is conducted confidentially, and stakeholders can choose to share their concerns anonymously.

### Training, Communication, Awareness

## Danx Carousel Group Human Rights policy

The Group is committed to raise awareness and knowledge of human rights issues amongst its' stakeholders, by providing specific awareness through training and communication on related matters within this policy.

Training, communication, and awareness of policy is a fundamental requirement of our business. We advocate transparency of all policies and where appropriate training takes place either at point of Induction of employees, or as part of an annual commitment to ensure that policy is communicated and awareness refreshed effectively.

All stakeholder policies are available on our intranet and websites.

### Stakeholder Engagement

We acknowledge our business is operated as part of an extended community of stakeholders, and as part of our regular dialogue with them we respect their view and expectations regarding this policy as outlined in the Supplier Code of Conduct.

### Reporting, monitoring and accountability

We have mechanisms in place for reporting human rights concerns and ensure accountability through regular monitoring.

We communicate and report on our **Human Rights** and related commitments of training and awareness as part of our annual reporting.

### Culture of continuous improvement

As part of our culture of continuous improvement we regularly evaluate against targets and review how we can best improve and strengthen our approach to addressing our policies supported through our values of Caring, Learning and Ownership. We are committed to continuously improving our policies and regularly review and update this policy to reflect evolving standards and stakeholder expectations.

### Governance and Accountability

Governance and the accountability for the implementation of this policy is overseen by the Groups Executive and Senior Leadership team, to ensure that our business clearly understands the responsibility to respect this policy and its day-to-day implementation to stakeholders.

### Adoption of Policy

The Danx Carousel Group's Human Rights Policy statement is adopted by the Executive Leadership team management on **1<sup>st</sup> January, 2025**



# Danx Carousel Group Human Rights policy





#### **Review and revision of Policy**

This policy will be reviewed and revised annually for compliance to the policy content or as required if changes to legislation apply sooner.

#### **Contact**

If you have any questions relating to the content of this policy please direct them to [groupcompliance@danxcarousel.com](mailto:groupcompliance@danxcarousel.com)

**[DanxCarousel.com](http://DanxCarousel.com) | [Danx.com](http://Danx.com) | [Carousel.eu](http://Carousel.eu)**