

Responsibility Policy

aeven

Adaptive digital infrastructure

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Aeven Responsibility Policy

1. Introduction

1.1 Purpose

This Responsibility Policy acts as Aeven's statement of commitment to respect human rights, environmental, and economic sustainability, supporting our unyielding ambition and targets within this agenda.

1.2 Scope

In Aeven, we build our business on responsible conduct by adhering to the international minimum standard: **The UN Guiding Principles on Business and Human Rights (UNGPs)**, and **the OECD Guidelines for Multinational Enterprises (OECD)**.

The standard offers us and our business relations the most comprehensive framework to address all key areas of sustainable development: **Human rights (including labor rights)**, **environment (including climate)**, and **economic sustainability (including anti-corruption, anti-trust, and tax)**.

This policy describes how we operationalize our commitment by conducting regular impact assessments and by communicating our expectations to our employees and business relations.

The policy is a minimum standard, applicable to all Aeven's employees, organizational units, and services as well as our business relationships.

2. Our Commitment

2.1 Due Diligence and Access to Remedy

Aeven complies with national regulations of all countries in which we operate. In addition, Aeven commits to conduct regular impact assessments to identify and prevent or mitigate risks of impacts from our business practices on all key areas of sustainable development. We will measure the effects of our actions annually and communicate how we manage impacts to relevant stakeholders.

If an actual impact occurs, we will seek to stop the impact, prevent, or mitigate occurrences, and provide access to remedy to those impacted, where we have caused or contributed to the impact.

Stakeholders interested in viewing our latest impact assessment are welcome to contact us.

2.2 Responsibility in Aeven

In Aeven we develop our strategic objectives from a solid base of our responsibility due diligence, determining specific areas where we will contribute to sustainable development. As a leading provider of critical digital infrastructure, we are committed to deliver at the highest level, which implies having a deep understanding of our adverse impacts and acting diligently upon our findings.

3. Our Expectations to our Employees

Aeven's employees are instrumental in honoring our commitments. We embed our responsible business conduct throughout the entire organization by offering continuous training and ongoing assessments.

We expect from our employees that they assist us in our responsibility journey. This includes sharing of good ideas for improving our efforts to prevent or mitigate risks of impacts. We encourage our employees to inform us if they experience or identify adverse impacts on behalf of themselves or others on human rights, in environmental or economic areas, which Aeven may be causing, contributing to, or linked to.

Our employees can submit ideas or possible grievances through our [tell-us mechanism](#). Our Code of Conduct for Employees outlines our specific expectations of employees relating to responsible business conduct.

4. Our Expectations to Business Relations

In Aeven, we appreciate our strong network of business relationships. Our expectations to business relations are based on the same international minimum standard for responsible business conduct to which we also hold ourselves accountable.

We expect our business relationships to implement the minimum standard (UNGPs/OECD) as well. This includes asking the same from their business relationships. Any severe adverse impacts that our business relationships cause, contribute to, or are linked to, shall be communicated to us promptly.

5. Policy Integration

This policy is reflected* in all other policies, guidelines, and procedures in Aeven. We encourage our employees and other stakeholders to inform us about challenges in relation to any of the core elements of sustainability associated with our services, products, or business relationships.

**This work is ongoing in 2024*

6. Policy Development

This policy is developed by our internal experts, advised by external experts, and approved by our owner and CEO. The policy is communicated both internally and externally. The policy will be reviewed and, if necessary, revised every two years reflecting our progress in implementation.

7. Document information

This document is part of a record in QPoint, identified via the information below. Always use QPoint to access Aeven QMS documents.

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