

THE VOLVO GROUP

HUMAN RIGHTS POLICY



1. Business and human rights statement

The Volvo Group's mission is to drive prosperity through transport and infrastructure solutions. Efficient and sustainable transport contributes to the building of resilient societies, and enables economic, social, and cultural development. We continuously develop our products, services, and technologies to increase their value for our customers and promote the well-being and safety of people. This is embodied in our overall approach to human rights.

The Volvo Group is committed to respecting internationally recognized human rights and avoiding causing or contributing to adverse human rights impacts, as stated in the UN Guiding Principles on Business and Human Rights (UNGPR) and the UN Global Compact. We seek to address adverse human rights impacts with which the Volvo Group is involved. We continuously work to strengthen our human rights work in line with the following international frameworks:

- UN International Bill of Human Rights
- ILO's eight fundamental conventions
- UN Global Compact
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- Children's Rights and Business Principles

2. Application of this policy

This policy applies in addition to any applicable regulatory requirement, for all Volvo Group entities, employees and others working at our sites. The Volvo Group's Truck Divisions, Business Areas, and Group Functions are encouraged to take additional measures to those set forth herein, in furtherance of the objectives of this policy.

We have policies and processes in place which aim to ensure that our business operations are conducted in compliance with applicable laws and regulations in the countries where we operate, including relevant human rights related laws and regulations. Where the Volvo Group identifies local legislation that is inconsistent with internationally recognized human rights, we will work to ensure we continue to respect internationally recognized human rights while also being legally compliant.

3. Salient human rights risks

[The Volvo Group's sustainability ambitions](#) are divided into three areas: **Climate – Resources – People**. Human rights risks might be associated with our activities and business relationships in all three of these areas.

We consider the following to be the most salient human rights risks for the Volvo Group, being those in relation to which there is a heightened risk of potential adverse human rights impact occurring. These have been identified on the basis of human rights due diligence undertaken to date across our value chain, as part of our enterprise risk management process, through ongoing discussions with unions, peers and other stakeholders, and as a result of concerns reported via the Volvo Group's grievance channels. These risks are our current area of focus and we will remain alert to the potential for other human rights-risks that may arise in our business relationships.

Climate

We recognize the importance of the transition to a low carbon economy envisaged by the Paris Agreement, and that a safe and clean environment is essential for the full enjoyment of human rights. We are constantly considering **climate and environmental impacts** in our operations and value chain and are working continuously to reduce carbon emissions and waste, optimize water use, and improve our handling of solvents, oils, and chemicals.

To know more about our work on climate and the environment, please visit: www.volvogroup.com/climate

Resources

Some of the materials used in our products come from conflict-affected and other high-risk areas, and some materials and substances are potentially hazardous. The mining of **minerals and metals in conflict-affected and other high-risk areas** involves an increased risk of human rights violations. A dedicated Sustainable Minerals Program supports our efforts to pursue due diligence for supply chain transparency and to promote responsible sourcing, extraction, and handling of such materials. The program is built on the five-step framework of the **[“OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”](#)**. We have a target to phase out potentially hazardous materials and substances, where possible, and to secure their safe and responsible handling throughout the whole value-chain.

To know more about our work on materials and substances of concern, please visit: www.volvogroup.com/resources

People

As a human centric company, **safety** is a priority in everything we do. We have a vision for zero accidents with Volvo Group products and in our workplaces. We also expect mutual respect, **equal treatment, and respect for labor rights, including fair employment and working conditions, and respect for freedom of association and collective bargaining** in our own operations and our supply chain. We do not tolerate **harassment and discrimination** and aim to mitigate unconscious bias. We do not tolerate any form of **modern slavery and child labor** in our own operations and our supply chain **and encourage respect for children's right** to personal development and education. The **sale and use of our products in conflict and other high-risk contexts** could result in potential human rights risks for the Volvo Group. We review certain sales transactions from a human rights perspective with an aim to manage these risks.

To know more about our work on people and responsible business behavior, please visit: www.volvogroup.com/people



4. Implementing our human rights commitments

- We incorporate human rights requirements and the principles set out in this policy into our internal processes, policies, and guidelines, including through our Code of Conduct, our Supplier Code of Conduct, and our Health & Safety standards.
- We continuously work to reinforce that we do not tolerate any forms of forced labor, child labor, harassment and discrimination, and our aim to mitigate unconscious bias. We implement strategies to increase our diversity, equality, and inclusion, reflecting the diverse world in which we operate.
- We undertake proportionate human rights due diligence using a risk-based approach across the relevant parts of our value chain including in relation to our own operations, our supply chain, and our business relationships.
- We strive to ensure responsible sourcing of raw materials, as encompassed in our Sustainable Minerals Program, recognizing the enhanced risk of adverse human rights impacts that may be associated with sourcing from conflict-affected and high-risk areas.
- We use our leverage and influence to help address findings identified during our supply chain due diligence, taking account of the operational context and the nature of our business, engagement, and our business relationships.
- We review human rights aspects of certain military sales and other sales transactions as part of our Responsible Sales process, with the aim of avoiding our products being used or involved in instances of violations of human rights in conflict and other high-risk contexts.
- We recognize that despite our ambitions to promote proper use of our products and services, there will be instances of non-compliance or misuse by other parties that we are unable to prevent.
- We continue to improve our understanding of human rights impacts through training and building awareness of our colleagues, in our supply chain, and with our business partners.
- We report, internally and externally, about our human rights work and performance.



5. Human Rights Governance at the Volvo Group

The Volvo Group's Human Rights Governance framework includes cross-functional governance forums and working groups, led by a Human Rights Board comprised of relevant members of our Executive Board. The Human Rights Board is responsible for overseeing and directing the Volvo Group's human rights work.

The Corporate Responsibility function of the Volvo Group is accountable for coordinating the annual planning of the Volvo Group's human rights work and the implementation of such plans together with the rest of the organization. Our Truck Divisions, Business Areas and Group Functions are responsible for ensuring that the Volvo Group's standards for human rights, including resource and budget allocations, training, and monitoring, are upheld in their areas of responsibility. The planning and prioritization of human rights activities follows a risk-based approach considering country/region risk levels, risks specific to parts of the Volvo Group's value chain (e.g. purchase category, sales segment etc.), and potential concerns brought to our attention by internal and external stakeholders.

6. Grievance channels and remediation

Our employees, representatives of the Volvo Group, and external stakeholders can report any instances of breach of our Code of Conduct, including human rights violations, where the Volvo Group or any of its representatives are believed to be involved. Grievances can be reported through internal and publicly available grievance channels described in our Code of Conduct, including the Volvo Group Whistle.

Reports can be made anonymously wherever permitted by local law. Where a complainant identifies themselves, every effort will be made to keep their identity strictly confidential within the company. If a concern is raised in good faith, the Volvo Group will not tolerate retaliation against the person making the report. Once a report is made, the Volvo Group will, where possible, investigate the situation and act. The Volvo Group aims to provide for or cooperate in the remediation of negative human rights impacts where our activities have caused or contributed to them, and seek to play a role in the remediation of negative human rights impacts that we are directly linked to in our operations, products, services or business relationships.

To know more about our grievance channels, please see our [Code of Conduct](#) and [the Volvo Group Whistle](#).

A handwritten signature in black ink, reading "Martin Lundstedt".

Martin Lundstedt
President and CEO of the Volvo Group
Adopted July 01, 2021