

# Position Green - Human rights policy

## Introduction

Position Green is in the business of creating a sustainable, fair and resilient future through empowering corporations in navigating and fast-tracking their transformation within the ESG landscape. As such, Position Green actively works with a variety of clients at various stages of their own ESG journeys to improve their ESG performance. Throughout our own operations, our value chain and in our business dealings, Position Green seeks to respect human rights.

Our commitment to respect human rights is based on the corporate responsibility to respect human rights as outlined in the UN Guiding Principles for Business and Human Rights. We acknowledge internationally recognised human rights as defined by the International Bill of Human Rights and the International Labour Organisation's Fundamental Conventions, as well as other relevant human rights treaties. Furthermore, Position Green is committed to conducting human rights due diligence throughout our own operations and supply chain.

This human rights policy applies across the whole of the Position Green Group, including all subsidiaries and geographies. This policy applies to everyone at Position Green including staff, contractors and interns.

## A principled approach

In implementing our human rights policy, Position Green will apply the following principles:

- We will conduct human rights due diligence throughout our own operations and our value chain.
- We will institute practices to prevent and mitigate actual human rights impacts and constantly review those practices.
- We will provide appropriate remedy when we identify negative human rights impacts either caused by us or that we contribute to.
- We will work towards being a leading example of best practices within the field of business and human rights at large.

## Salient human rights issues

Through considering the type of work that Position Green undertakes, our specific industry, supply chain and geographic footprint, we have identified four issues as our salient human rights issues. We will place increased priority on these issues throughout our operations and business relationships and work to reduce any potential impact we may have. Our salient human rights issues are:

- **Working with clients who have historically poor human rights performance**  
Position Green is committed to working with clients at all stages of their sustainability journeys. Because of this, there is a risk of working closely with companies that may have negative human rights impacts but are working in good faith towards improving their practices and reducing their negative human rights impact. We recognise that there is a fine line between helping companies improve and giving approval to poor practices. We will remain vigilant in utilising our leverage and influence with companies to lead to positive improvements in human rights and actively work against contributing to greenwashing or otherwise contributing to negative impacts on human rights via our client relationships.
- **Ensuring data protection and privacy rights**

As an ESG technology solutions provider, we inherently deal with significant amounts of data which can include personal or otherwise sensitive data. Position Green remains committed to ensuring the protection of this data and adheres to all relevant laws and regulations related to data handling including the GDPR.

- **Promoting a safe and healthy workplace**

Position Green is committed to ensuring its employees work in a safe environment absent from any form of harassment, discrimination or abuse. Healthy work-life balance is promoted, and practices such as excessive overtime are not promoted. Furthermore, we seek to establish a culture of healthy teamwork and working relationships.

- **Building a diverse and inclusive workplace**

Our people are at the core of our business. We value what each member of our team brings to work and are actively committed to supporting and growing a diverse and inclusive workforce. Position Green is committed to non-discrimination and will not tolerate discrimination based on any personal characteristic or political and religious belief.

## Our commitments

Within our own operations, Position Green will:

- Ensure that all employees, contractors and third-party personnel are aware of this policy.
- Provide training on relevant human rights topics to our employees, contractors and third-party personnel
- Ensure the protection of employee welfare, health and work-life balance.
- Respect the right of employees to collective bargaining and agreements.
- Provide continued learning and development opportunities for employees.
- Have zero tolerance for discrimination on all grounds including but not limited to gender, race, age, religion, disability, nationality, ethnic origin, sexual orientation or any other protected status.
- Allow employees to decline to work any project that may go against their own moral or religious code.
- Provide living wages as a minimum.
- Maintain a safe working environment.
- Not tolerate any form of forced, involuntary or child labour.
- Regularly communicate our human rights due diligence.

In respect to the businesses we work with, Position Green will:

- Use our leverage to push for best practices pertaining to human rights with our business partners and in client relationships.
- Include contractual clauses expressing an expectation for all business partners to avoid violations of human rights.
- Be prepared to exit business relationships due to serious or continued human rights abuses.
- Be guided by ethical guidelines set forth by Norges Bank Investment Management (NBIM), specifically avoiding working with any company found on NBIM's excluded company list.
- Actively maintain a high-level internal Ethics committee tasked with the overview and governance of ethics issues across the Position Green Group.

## Grievance and remedy

Position Green maintains a whistleblowing channel accessible to all stakeholders found [here](#). The mechanism is externally managed and anonymous. We encourage anyone who has concerns about breaches of this human rights policy to send a message outlining their concerns through our whistleblowing channel.

## **Commitment to continued improvement**

Human rights due diligence is not a one-off exercise, and Position Green refuses to treat it as so. We will continue to work to better identify, assess and manage our potential negative human rights impacts. Position Green remains committed to evaluating how to best respect human rights in our own operations and in our business relationships and will use our influence to push conversations and actions regarding business and human rights forward.

Approved by Position Green Group CFO – Ole Martin Tangen

Date: 16 June 2023