

Human Rights Policy

1. Introduction

Avinto believes in and is committed to maintaining a safe working environment that respects the human rights and individuality of every employee. At Avinto, we have implemented a Human Rights Policy to ensure strict adherence to these principles. This policy serves as a declaration of our commitment to sustainable social development by respecting human rights in every aspect of our business operations.

2. Policy Statement

Avinto is dedicated to upholding human rights, dignity, and fairness, as reflected in our Code of Conduct, values, policies, and processes, including our employment practices, non-discrimination policies, and health and safety policies. Further, Avinto exhibits compliance with all local laws and regulations regarding human rights in every location where we operate.

As best practice for identifying and addressing human rights risks and impacts, we align our values and practices with the Universal Declaration of Human Rights, the UN Convention on Economic, Social, and Cultural Rights, the UN Convention on Civil and Political Rights, the UN Convention on the Rights of the Child, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

3. Scope of the Policy

This policy applies to all employees across our operations in Norway and Nepal. It is intended to operate simultaneously with Avinto's values, other corporate policies, and the Code of Conduct.

Additionally, Avinto requires all suppliers and business partners to respect and refrain from infringing upon human rights.

4. Respect for Diversity and Prohibition of Discrimination and Harassment

At Avinto, diversity and inclusivity are core values reflected in our dedication to creating a work environment free from discrimination and harassment. Avinto adopts a zero-tolerance policy for discrimination based on race, colour, religion (creed), gender, gender expression, age, national origin (ancestry), disability, marital status, sexual orientation, or any other personal characteristics.

Avinto is dedicated to providing equal employment opportunities in all aspects of our operations, including but not limited to, recruitment, board membership, job advertisements, training, promotion and transfers, compensation, termination, and access to company facilities, programs, and services.

5. Prohibition of Forced Labour and Child Labour

Avinto strictly prohibits the use, support, or tolerance of forced labour, child labour, and human trafficking. According to the International Labour Organization (ILO), child labour includes any employment of individuals under the age of fifteen (15) or below the age at which mandatory education is completed, whichever is higher.

Avinto's age requirements exceed those set by the ILO with our Code of Conduct requiring all workers to be at least twenty (20) years of age, or above the national legal age of compulsory schooling and minimum working age, whichever is higher.

6. Respect for the Freedom of Association

Avinto respects the rights of employees to form trade unions and engage in collective bargaining effectively. At Avinto, we are dedicated to negotiating in good faith through constructive dialog with labour representatives.

Avinto requires all stakeholders to comply with the workers' rights to freely associate. This includes prohibiting any interference with efforts to organise or conduct union activities, as well as any actions aimed at intimidating, harassing, or retaliating against workers for participation in a union.

7. Working Hours and Compensation

Avinto complies with all applicable wage and hour laws, including regulations on fair wages, working hours, overtime compensation, break times, day-offs, and vacations. These terms are outlined in employment contracts that adhere to local labour laws.

Avinto is committed to ensuring employees do not exceed the local and international caps on working hours. We follow Nepali regulations in our Kathmandu office and Norwegian regulations in our Norway locations. In cases where overtime is required, employees are compensated at a rate above the standard pay or provided with additional day-offs as per the local rules and regulations.

8. Commitment to a Healthy and Safe Working Environment

Avinto is dedicated to safeguarding the physical and mental well-being of our employees by maintaining safe and healthy workplace environments. At Avinto, we believe that the protection of life and health in the workplace is a fundamental right.

Avinto ensures that all employees have access to safe, hygienic, and healthy working conditions, with robust safety management systems. We promote a work environment that

minimises mental strain and provides necessary breaks or time off for rejuvenation. As air pollution is a major problem in Kathmandu, Nepal, we have acquired air-purifiers, and air conditioners to ensure a safe and healthy work environment. Nepali winters can be tough, with little indoor heating, and we have also acquired ovens to provide a comfortable and healthy work environment. The result of this is that Avinto's Kathmandu office has a considerably higher comfort and standard than the majority of Nepali offices and homes.

9. Reporting Violations of the Policy

Avinto is committed to ensuring a safe working environment that respects human rights. Employees who experience, witness, or suspect any violations of this policy are required to report the incident immediately to their supervisor, manager, or human resources representative, or through Avinto's whistleblowing channel.

Reports of any suspected or proven cases of violations will be treated with the utmost confidentiality and investigated promptly. Avinto maintains a zero-tolerance policy for retaliation against any individual who reports violations, or who cooperates in an investigation.

10. Investigation and Action

In the event of a complaint, Avinto will conduct a thorough and timely investigation. This will include interviews with the person who made the report, the alleged perpetrator, and any other individuals who may have relevant information. If the claim of human rights violation is substantiated, Avinto will take appropriate corrective action.