



# HUMAN RIGHTS POLICY

Respecting People. Enabling Transparency. Driving Change.

## 1. Purpose & Scope

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givvable is committed to respecting and upholding human rights across all aspects of our business operations, value chain, and the broader ecosystems in which we operate. This policy sets out our commitment to the United Nations Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, and other internationally recognised frameworks.

givvable is a United Nations Global Compact (UNGC) participant and supports the Ten Principles of the UNGC, which include the area of Human Rights.

As a technology company providing sustainability intelligence and supply chain transparency solutions, givvable recognizes that our platform directly supports organizations in identifying, assessing, and addressing human rights risks. We hold ourselves to the same standards we help our clients uphold.

### 1.1 Scope

This Policy applies to:

- All givvable employees, contractors, and consultants globally
- Members of the Board of Directors and senior leadership
- Our direct suppliers, technology partners, and vendors
- Third parties acting on givvable's behalf

This Policy covers our operations in all jurisdictions in which givvable operates or intends to operate, with a primary focus on Australia and New Zealand.

## 2. Our Commitment

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givvable is guided by the principle that all people are entitled to fundamental human rights, regardless of nationality, gender, race, ethnicity, religion, disability, age, or sexual orientation.

We recognise our responsibility to:

- Respect human rights and avoid causing or contributing to adverse human rights impacts

- Seek to prevent or mitigate human rights risks linked to our operations and value chain
- Remediate harm where we have caused or contributed to adverse impacts

Our approach to this is informed by best-in-class policies for our industry, including, as applicable, givvable's own Best Practice Indicators for protection of human rights and prevention of modern slavery.

### **3. Salient Human Rights Issues**

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Having conducted an assessment of our operational context, supply chain, and product use cases, givvable has identified the following as our most salient human rights issues:

#### **3.1 Labour Rights & Modern Slavery**

We are committed to ensuring that our operations and supply chain are free from forced labour, child labour, debt bondage, human trafficking, and other forms of modern slavery. This includes ensuring:

- All employees are paid at or above the relevant minimum wage and with the aim to pay competitive market rates within industry benchmark ranges
- Working hours comply with applicable laws and collective agreements
- Workers have the right to freely associate and collectively bargain
- Conducting due diligence on suppliers to identify human rights and modern slavery risks

#### **3.2 Non-Discrimination & Equal Opportunity**

givvable prohibits discrimination in any form, including on the basis of:

- Race, ethnicity, national origin, or caste
- Gender, gender identity, or sexual orientation
- Age, disability, religion, or political opinion
- Pregnancy, family responsibilities, or marital status

We are committed to pay equity, inclusive hiring practices, supplier diversity and social procurement, and accessible workplaces.

#### **3.3 Privacy & Data Rights**

As a data-driven technology platform, givvable recognises the right to privacy as a fundamental human right. We are committed to:

- Collecting and processing personal data only for legitimate, specified purposes
- Implementing Privacy by Design principles in all product development
- Complying with the Australian Privacy Act 1988, GDPR (where applicable), and other relevant data protection laws
- Empowering individuals with transparency and control over their data

#### **3.4 Ethical Use of Technology & AI**

givvable is committed to ensuring our technology — including any AI and machine learning components — is developed and deployed ethically and does not facilitate harm. We will not knowingly provide our platform to actors engaged in:

- Mass surveillance or targeting of individuals on the basis of protected characteristics

- Human rights abuses, including in conflict-affected or high-risk areas
- Violations of applicable sanctions regimes or export controls

### 3.5 Supply Chain Human Rights

We expect all suppliers and partners to uphold human rights standards consistent with this Policy and screen our suppliers accordingly with a preference for suppliers with third party validated and aligned practices. Our Supplier Code of Conduct incorporates requirements aligned with the ILO Core Conventions.

### 3.6 Safe and Healthy Working Environment

We uphold safe and healthy working conditions for all workers and take action to prevent, mitigate, and remediate risks across our operations and supply chains.

## 4. Human Rights Due Diligence

givvable conducts ongoing human rights due diligence (HRDD) commensurate with our scale and risk profile. Our HRDD process includes:

| Step              | Activity                                                                                                                      |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Identify & Assess | Map actual and potential human rights impacts across our operations, supply chain, and product use cases annually.            |
| Integrate & Act   | Embed findings into policies, procurement decisions, vendor selection, product design, and partnership agreements.            |
| Track & Measure   | Monitor the effectiveness of our measures through KPIs, supplier screening, and supplier or stakeholder engagement practices. |
| Communicate       | Publish our annual Communication of Progress to the UNGC.                                                                     |
| Remediate         | Provide or cooperate in remediation where givvable has caused or contributed to adverse human rights impacts.                 |

## 5. Governance & Accountability

### 5.1 Roles and Responsibilities

| Role                    | Responsibility                                                                                                                            |
|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| Directors               | Approve and oversee this Policy; hold management accountable for human rights performance.                                                |
| Chief Executive Officer | Champion human rights culture; integrate human rights into business strategy.                                                             |
| Sustainability          | Implement for own function, review policy and update to align with best practices, and contribute to any internal and external reporting. |
| People & Culture        | Implement for function by embedding human rights in HR practices, training, and employee relations.                                       |

|                                              |                                                                                                                                                                                  |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Business Development and Partnerships</b> | Implement for function by assessing stakeholder human rights risks.                                                                                                              |
| <b>Product &amp; Engineering</b>             | Implement for function by assessing supplier human rights risks; apply ethical technology principles; conduct algorithmic impact assessments; maintain Supplier Code of Conduct. |
| <b>All Employees</b>                         | Understand and comply with this Policy; report concerns through appropriate channels.                                                                                            |

## 6. Reporting & Grievance Mechanisms

givvable is committed to providing safe, accessible, and confidential channels for reporting human rights concerns. We operate a zero-tolerance approach to retaliation against anyone who raises a concern in good faith.

### 6.1 Internal Reporting

- Employees may raise concerns with their line manager or People & Culture
- An anonymous whistleblower reporting channel will be made accessible to all employees
- All reports are investigated promptly, impartially, and confidentially

### 6.2 External Stakeholders

- Suppliers, partners, and third parties may raise concerns via support@givvable.com
- Community members or individuals affected by our operations may contact us through our public website

### 6.3 Non-retaliation

givvable strictly prohibits retaliation against any person who, in good faith, reports a suspected violation of this Policy, participates in an investigation, or exercises any other rights under this Policy. Any employee found to have engaged in retaliation will be subject to disciplinary action, up to and including termination.

## 7. Training & Awareness

givvable invests in ongoing human rights education to ensure all team members understand their responsibilities. Our training programme includes:

- Mandatory human rights and modern slavery induction training for all new employees
- Annual refresher training for all staff, with enhanced modules for procurement and product teams
- Targeted training for senior leaders on human rights due diligence and governance
- Integration of human rights considerations into supplier onboarding processes

## 8. Transparency & Reporting

givvable is committed to transparent public reporting on our human rights performance. We publish:

- An annual Communication of Progress to the UNGC

We welcome feedback from stakeholders on our human rights approach and are committed to continuous improvement.

## 9. Applicable Frameworks & Standards

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| Governing International Frameworks                                                                |
|---------------------------------------------------------------------------------------------------|
| UN Guiding Principles on Business and Human Rights (UNGPs) — ‘Protect, Respect, Remedy’ Framework |
| UN Universal Declaration of Human Rights (UDHR)                                                   |
| International Labour Organization (ILO) Core Conventions on Labour Standards                      |
| OECD Guidelines for Multinational Enterprises                                                     |
| UN Global Compact Ten Principles                                                                  |
| Australian Privacy Act 1988 and Australian Privacy Principles                                     |

## 10. Policy Review & Amendment

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This Policy will be reviewed annually by the Directors, with input from Sustainability and People & Culture. Ad hoc reviews will be conducted in response to significant changes in our business operations, applicable law, or the emergence of new human rights risks.

This is the most current version of this Policy. All previous versions are archived and available upon request.

This Policy has been approved and takes effect from 1 July 2026.