

DONKEY REPUBLIC

Human & Labour Rights and Anti-Corruption Policy

Version no. 2 2023

Adopted by the board of directors on

March 2023

Introduction and Purpose

Donkey Republic provides sustainable mobility solutions to urban areas, to improve public health, space utilisation and congestion, as well as reducing noise pollution, and the release of greenhouse gas emissions into the atmosphere. We provide a better alternative transportation mode and we aim to deliver a high quality bike-sharing service, with a sustainable lifecycle approach to our operations and production of fleet.

At Donkey Republic we consider responsibility to be a two-fold concept consisting of being environmentally sustainable as well as acting socially responsible towards our employees, riders, suppliers, partners, the public and other stakeholders. This means we must act in accordance with Human & Labour Rights and Anti-corruption.

Our Statement and Scope of the Policy

At Donkey Republic we take responsibility towards acting and behaving in accordance with human & labour rights and anti-corruption across all our business activities and operations. We follow and assess our activities to be in alignment with the UN's Global Compact initiative in the areas of human rights, labour standards, the environment and anti-corruption - UN Ten Principles¹, the UN's Sustainable Development Goals (SDGs)², The International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work³ and the UN Guiding Principles for Business and Human Rights⁴. (please refer to the footnote and the appendix at the bottom of this document for further information).

¹ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

² <https://sdgs.un.org/goals>

³ <https://www.ilo.org/global/lang-en/index.htm>

⁴ <https://www.ungoreporting.org/framework-guidance/>



Donkey Republic acknowledges the risks within the mineral value chain associated with labour & human rights, the environment and anti-corruption, and therefore we are committed to address these risks throughout our Lithium-Ion battery supply chain to the highest sustainable level. Specifically, we will adhere to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict - Affected and High Risk Areas.⁵

Our Commitment and Responsibility

It is the responsibility of the executive management of Donkey Republic to implement this policy and it is the responsibility of all employees to ensure that our business activities and behaviour are aligned with this policy.

All employees at Donkey Republic must respect all human & Labour rights (please refer to the Appendix section for a more comprehensive list). We will highlight below those we believe are most relevant to Donkey Republic.

Labour Conditions and Human Rights

Fair working hours and wages - At Donkey Republic we respect the Working Environment Act, regarding hours per day and the amount of days worked in a week, and any overtime requirements are previously agreed. The terms of employment are in compliance with EU standards. At Donkey Republic we are proud to offer a flexible hours approach to our employees, and we respect to pay at all times the agreed salary/wages.

Non-Discrimination - Donkey Republic is an equal opportunity employer and we have a zero tolerance policy towards discrimination at the workplace, based on age, gender, marital status and civil partnership, pregnancy or maternity, race, ethnicity, religion or belief, sex or sexual orientation, or social standing, or any other status protected under law. It applies to all areas of employment including recruitment and career development.

Equal Opportunity Employment - Donkey Republic hires, promotes and compensates employees based on the individual's performance and equal pay is received for equal work.

Donkey Republic makes sure our recruiting process provides opportunities for all, independent of gender, race, nationality and age group. All jobs in Donkey Republic are advertised publicly before positions are filled, going through a competitive process. Salaries for all employees are defined based on the position the employee has and not on any other factors, such as gender, race, nationality or age group.

⁵ <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>



Health and Safety - Donkey Republic provides a safe, clean and healthy work environment subject to all applicable laws. Employees are provided with safety training when appropriate to avoid accidents and harm at the workplace, as well as preventive control measures, or protective equipment when needed. Donkey Republic appoints a Health and Safety Representative for focusing on occupational health and safety in the business, to ensure a good working environment and prevent Health and Safety issues.

Donkey Republic identifies hazardous materials, such as the ion-lithium batteries used in our electric bikes and ensures the safe handling, transportation, reuse, recycling and disposal.

Donkey Republic acknowledges the risks associated with vandalism of the bike fleets, specifically those containing the ion-lithium battery, as this could potentially become a hazardous threat to the public. We ensure our engineers design anti-theft mechanisms, and set up methods to relocate the lost bikes if applicable.

Freedom of association to join trade unions - Donkey Republic respects the employee's rights to join, form or organise trade unions in compliance with local law. Many if not most of Donkey Republic employees are members of a union.

Respect ethics in Material usage - Donkey Republic encourages its battery suppliers to adhere to the OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals, and set up practices to avoid the use of raw materials sourced from conflicted zones, including a Supplier Code of Conduct.

No Child Labour - Donkey Republic does not employ directly or indirectly individuals below the minimum age permitted by local law. As a company we have a zero tolerance to engage in any form of child labour and subject them to physical or mental harm.

No forced labour & No human trafficking - Donkey Republic does not engage in using force, or other forms of coercion, abduction, fraud, deception, or abuse of power or a position of vulnerability to recruit, transport, transfer, or receive persons. Donkey Republic has a zero tolerance to force, bond or involuntary prison labour any individual, and must respect the employees free will.

Anti-corruption

Donkey Republic does not engage in any corrupt behaviour including fraudulent practice, coercion, collusion, unethical practice, nor obstruction such as falsification of documents. In the event of any such behaviour, this must be communicated to Donkey Republic.

Financial expenses & transactions - All business transactions are done digitally. Cash transactions are not allowed. Donkey Republic uses the Pleo System for business related reimbursements.

Internal processes include accounting for financial transactions and expenses for tracking any potential unethical practice. In the event of encountering one, the CFO must be notified immediately. External auditors have conducted an internal audit at Donkey Republic.

Processes are in place. For expenses between 100 EUR and 1.000 EUR the approval of the manager is needed. For expenses between 1.000 EUR and 10.000 EUR, or above the approval of the CFO is needed.

Tender applications - Donkey Republic applies for public funding - in most cases in the shape of a public tender - either directly or through partners. Donkey Republic does not accept any corrupted behaviour or the occurrence of bribes in any form. The Company's practice is to not provide any individual benefits to anyone, nor any hints that such benefits could be available at any point. Donkey Republic promotes the same values with its partners, and does not get involved in deals where there are reasons to believe illegal practices are carried out.

Hospitality and gifts - Donkey Republic ensures the proper handling of payments, i.e. separation of duties in regards to order and payment approval as well as four eye principles for all money transactions. Donkey Republic does not accept any type of gift above 50EUR or equivalent, or 100EUR per year from any supplier, partner or other relevant stakeholder. Cash gifts will not be accepted, and any social outline outside restaurant, dinner, drinks are to be elevated.

We will achieve this by:

Donkey Republic will make this policy and other relevant information available to the public, in our website, to communicate our business practice to our stakeholders. In case of violation, or suspicion, towards this policy or applicable laws or regulations, do not hesitate to contact us with further details and we will act accordingly.



Donkey Republic has embedded these principles in our Employee Handbook, to provide employees with information and guidelines to behave in alignment with our policies. We make sure that we communicate our handbook regularly, and also review it yearly.

In the agreements we sign with suppliers/contractors, we as a minimum have the following conditions.

- The Supplier/Contractor undertakes to respect the protection of internationally proclaimed human rights.
- The Supplier/Contractor undertakes to respect labour rights, including freedom of association, elimination of all forms of forced and compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation.
- The Supplier/Contractor undertakes initiatives to promote greater environmental responsibility.
- The Supplier/Contractor undertakes to work against corruption in all its forms, including extortion and bribery.
- In addition, we may follow-up with visits to the supplier/contractor.
- Donkey Republic has set up a Supplier Code of Conduct in accordance with the law and Human & Labour Rights, the environment and Anti-Corruption.

This Human & Labour Rights and Anti Corruption Policy has been reviewed by Donkey Republic in March 2023 and it will be reviewed on an annual basis. This policy will be available on the Company's website at: <https://invest.donkey.bike/esg/>

Appendix: Principles and standards

Employees at Donkey Republic are expected to manage adverse impacts on internationally recognised human rights including labour rights as stated in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines on Multinational Enterprises.

Human rights including labour rights

The Human rights including labour rights principles listed below should as a minimum be managed.

Manage potential and actual adverse impacts on:

1. Right to self-determination (indigenous peoples rights)
2. Right to non-discrimination
3. Right to work (training, contract and termination)
4. Right to enjoy just and favourable conditions of work (including equal pay for equal work, a living wage (minimum wage), safe and healthy working conditions, equal opportunities for everyone to be promoted, and rest, leisure and paid holidays)
5. Right to form and join trade unions and the right to strike
6. Right to social security, including social insurance
7. Right to family life (including protection of mothers before and after childbirth)
8. Right to adequate standard of living (including adequate food and its fair distribution, adequate clothing, adequate housing, and water and sanitation)
9. Right to health
10. Right to education
11. Right to take part in cultural life, to benefit from scientific progress, material gains from inventions, and moral rights of authors (protection of copyrights)
12. Right to life
13. Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment
(including free, prior and informed consent to medical or scientific experimentation)
14. Right not to be subjected to slavery, servitude or forced labour
15. Right to liberty and security of person

16. Right of detained persons to human treatment
17. Right not to be subjected to imprisonment for an inability to fulfil a contract
18. Right to freedom of movement
19. Right to aliens to due process when facing expulsion (seeking asylum)
20. Right to a fair trial
21. Right to be free from retroactive criminal law
22. Right to recognition as a person before the law
23. Right to privacy
24. Right to freedom of thought, conscience and religion
25. Right to freedom of opinion and expression (including freedom of information)
26. Right to freedom from war propaganda, and freedom from incitement of racial, religious or national hatred
27. Right to freedom of peaceful assembly
28. Right to freedom of association
29. Right to protection of the family and the right to marry
30. Right to protection of the child and right to nationality
31. Right to participate in public affairs
32. Right to equality before the law, equal protection of the law and rights of non-discrimination
33. Rights of minorities (culture, religious practice and language)

2. Environmental principles

The environmental principles listed below should as a minimum be managed.

Environmental principles that employees must manage:

1. Demonstrate continuous improvements of the overall environmental performance related to its operations
2. Have basic management tools in place, consolidated at top management level and have a designated person responsible for coordination of environmental management activities.
3. Legal compliance with all regulated environmental issues related to waste management, air pollution, wastewater, soil contamination, and biodiversity.

4. Maintain and update on a regular basis a list of the relevant environmental legislation to comply with.
5. Assure compliance with prohibited chemicals list (e.g. for agrichemicals from World Health Organisation, WHO).
6. Assure compliance with international environmental conventions and protocols, e.g. the Montreal Protocol about ozone depleting substances or Protocol on Persistent Organic Pollutants (POP).
7. Keep record of all pollution incidents and report these to relevant authorities as required by applicable permits and legislation.
8. Provide necessary organisation, training of employees, awareness raising, operational control and monitoring to assure and maintain legal compliance.
9. Support a precautionary approach to environmental challenges, which involves a systematic risk assessment (hazard identification, hazard characterization, appraisal of exposure and risk characterization), risk management and risk communication.
10. Support activities that involve waste reduction and resource optimization from suppliers' operations.
11. Support activities that promote green procurement of more eco-efficient products.
12. Protect the environment by using environmentally sound technologies that are less polluting, and use all resources in an efficient way.
13. Strive for integration of environmental attention into all elements of business planning and decision-making.
14. The approach to environmental responsibility should foster openness and dialogue with employees and the public.
15. Minimise the adverse impacts from activities, products and services through a proactive approach and responsible management of the environmental aspects (including but not limited to):
 - i. Use of scarce natural resources, energy and water
 - ii. Emissions to air and releases to water
 - iii. Noise, odour, and dust emission
 - iv. Potential and actual soil contamination
 - v. Waste management (hazardous and non-hazardous substances)

- vi. Products issues (design, packaging, transport, use and recycling/disposal)
- 16. Establish and maintain emergency procedures.
- 17. Have a site emergency plan in place with detailed guidelines/training for major incident response, to effectively prevent and address all health emergencies and industrial accidents that can affect the surrounding community or have an adverse impact on the environment.
- 18. Emergency response plan communicated to local authorities, emergency services and potentially affected local communities, as required.
- 19. Maintain an inventory of hazardous substances used in the operation and stored, and assess substitution options toward more environmental friendly substances.
- 20. Ensure that access to relevant up-to-date Material Safety Data Sheets (MSDS) for chemical substances.
- 21. Assure safety procedures/controls in place for hazardous substances
- 22. Assure minimising the potential contamination of air, fresh water, soil and groundwater from chemical substances.

3. Anti-corruption

The anti-corruption principles listed below should as a minimum be managed.

Manage potential and actual adverse impacts on:

1. Documenting, recording and keeping income and expenditure data available for periods determined by law, and if not regulated for a minimum of three years;
2. Not permitting corruption of public officials or private-to-private corruption, including both 'active' and 'passive' corruption (also referred to at times as 'extortion' or 'solicitation');
3. Not permitting payment of bribes or trading in influence in relation in relation to business partners, government officials or employees; including through the use of intermediaries;
4. Not permitting use of facilitation payments, unless you are subject to threats or other coercion;
5. Not hiring government employees to do work that conflicts in any manner with the former official obligations of that employee;

6. Not permitting political contributions, charitable donations and sponsorships in expectation of undue advantages;
7. Not offering or accepting excessive gifts, hospitality, entertainment, customer travel and expenses;
8. Abstaining from nepotism and cronyism;
9. Not permitting or participating in money laundering.



Signatures

Executive Board

Niels Henrik Rasmussen
Chief Executive Officer

Christian Dufft
Chief Financial Officer

Board of Directors

Caroline Søbørg Ahlefeldt-Laurvig-Bille
Chairperson

Laurent Mercat

Karl Erik Wenngren

Marina Kolesnik

Jens Kramer Mikkelsen

Marion Galan Alfonso

Jesper Lilledal Holmgaard

Erdem Ovacik