

Human Rights Policy

Policy Title	Human Rights Policy
Responsible Department	Group Legal
Geographical Scope	Global (all entities of Aebi Schmidt Holding AG)
Effective Date	January 1, 2026
Last Update	-
Approved by	Board of Directors
Audited by	-
Number/Version	1.0
Classification	Public

1. Purpose

Aebi Schmidt Holding AG (together with its subsidiaries, “Aebi Schmidt”) has adopted this Human Rights Policy (this “Policy”) to ensure that our respect for fundamental human rights is understood and promoted by our stakeholders.

2. Scope

This Policy applies to Aebi Schmidt’s directors, officers and employees. This policy also applies to our business partners, suppliers, vendors, contractors and other parties who are directly linked to our operations, products or services, regardless of geographic location.

3. Policy

Aebi Schmidt is guided by the internationally recognized human rights principles of the United Nation’s Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the International Labor Organizations’ Declaration on Fundamental Principles and Rights at Work and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. Aebi Schmidt expects its business partners, suppliers, vendors, contractors and other parties who are directly linked to its operations, products or services to reflect these same values.

3.1 Equality and Freedom from Discrimination

Aebi Schmidt provides equal employment opportunities to all employees and applicants without regard to race, color, religion, sex, pregnancy, sexual orientation, gender identity or expression, national origin, ancestry, age, disability, genetic information, marital status, veteran status or any other characteristic protected by federal, state or local laws. This commitment applies to all aspects of employment, including hiring, promotion, compensation, training, benefits, discipline and termination. Every decision is based on merit, qualifications, abilities and experience.

Aebi Schmidt is dedicated to maintaining a work environment where every individual is

treated with dignity and respect. Discrimination, harassment, or retaliation of any kind is strictly prohibited and will not be tolerated.

3.2 Forced Labor, Human Trafficking and Child Labor

Aebi Schmidt is opposed to, and strictly prohibits (i) any and all work that is exacted from any person under the threat of penalty or for which the person has not agreed to in exchange for a fair wage, including, but not limited to, indentured labor, bonded labor, prison labor, military labor, slave labor and any form of human trafficking; and (ii) the economic exploitation of children, including any and all forms of labor that jeopardize their education and development.

Aebi Schmidt recognizes the importance of assuring that its suppliers engage in appropriate behavior and comply with the laws that apply to them. Aebi Schmidt has adopted a Supplier Code of Conduct and Supplier Terms and Conditions which require suppliers to comply with applicable laws relating to human trafficking and slavery, including laws related to labor, working hours, wages, and health and safety, guided by the California Transparency in Supply Chains Act and UK Modern Slavery Act.

3.3 Freedom of Association

Aebi Schmidt recognizes the rights of employees to join trade union and employee representative bodies. Where employees are represented by a legally recognized trade union or employee representative body, we are committed to establishing a constructive dialogue and bargaining in good faith with their freely chosen representatives.

3.4 Water Resources

Aebi Schmidt believes sustainable water supplies and safe drinking water is a fundamental human right.

3.5 Our Communities

Aebi Schmidt respects the human rights of all persons in the communities in which it conducts business, as well as recognizes the importance of environmental stewardship and

using resources wisely. Aebi Schmidt strives to be socially responsible in the use of resources for the long-term benefit of society.

3.6 Safe and Healthy Workplace

Aebi Schmidt is committed to providing a safe and healthy workplace, eliminating preventable accidents, providing appropriate health and safety trainings and complying with applicable safety and health laws, regulations and internal requirements.

Aebi Schmidt encourages personnel to report safety concerns and follow any safety instructions, standards and requirements. Employees are required to wear protective equipment. Working under the influence of drugs and alcohol can impair one's judgement and creates an unacceptable safety risk and is thereby strictly prohibited.

Aebi Schmidt has zero tolerance for any threats of harm against its employees or its property. Weapons are strictly prohibited, and Aebi Schmidt only makes limited exceptions as required by law.

4. Aebi Schmidt Ethics Hotline

Individuals have the option to report a violation of this Policy or Aebi's Schmidt's Code of Conduct, or other ethics concern through Aebi Schmidt's Ethics Hotline by (i) calling the toll-free phone number designated for their country (available on the Company's website); or (ii) going to the following website (<https://aebi-schmidt.ethicspoint.com/>). All Ethics Hotline communications are through a third-party provider, so if an individual would like to remain anonymous, such individual will not be identified in any way to Aebi Schmidt, where legally permissible. While the individual can remain anonymous if desired, it can sometimes make a thorough investigation by Aebi Schmidt more difficult.

Glattpark, Switzerland
January 1, 2026