



Modern Slavery, Forced Labour and Child Labour Statement

Reporting period: 1 January – 31 December 2025.

2026

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About this statement

Polestar has a global commitment to inclusion and responsible business conduct. We respect internationally recognised human rights, prohibit forced labour and child labour, and comply with applicable laws and regulations wherever we operate. As part of our purpose driven transition to electric mobility, we work to protect human rights and embed principles of social justice across our value chain.

This is a joint Modern Slavery and Forced Labour Statement issued on behalf of Polestar Automotive Holding UK PLC and its relevant subsidiaries. It is intended to meet the reporting requirements of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cth), and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. The Statement describes Polestar's approach and the actions taken during 2025 to identify, prevent and mitigate the risks of modern slavery and forced labour within our own operations and throughout our supply chain.

This Statement covers all entities within the Polestar Group, including Polestar Automotive Holding UK PLC, Polestar Automotive UK Ltd., Polestar Automotive Australia Pty Ltd., and Polestar Automotive Canada Inc.

In preparing this Statement, Polestar has engaged with relevant internal stakeholders and legal entities, drawing on the outcomes of our sustainability and human rights due diligence processes. In partner-operated manufacturing facilities, Polestar's requirements are embedded through codes of conduct, directives and contractual obligations, complemented by collaborative programmes and transparency initiatives.

This Statement has been reviewed and approved by the highest governing bodies of the applicable reporting entities.

Further information

Comprehensive disclosures on policies, actions, metrics and targets related to human rights, workers in the value chain and affected communities are available in Polestar's Sustainability report 2025.

In addition, more information about Polestar, its organisational structure and group relationships, visit our website and Annual Report.

List of entities included in the Sustainability report:

The significant subsidiaries of the company as of December 31, 2025 are listed below.

| Legal Name | Jurisdiction of Incorporation | Proportion of Ordinary Shares Held by the Company % |
|---|-------------------------------|---|
| Polestar Holding AB | Sweden | 100 |
| Polestar Automotive (Singapore) Pte. Ltd. | Singapore | 100 |
| Polestar Performance AB | Sweden | 100 |
| Polestar Automotive Canada Inc. | Alberta, Canada | 100 |
| Polestar Automotive USA Inc. | Delaware, USA | 100 |
| Polestar Automotive US Investment Inc. | Delaware, USA | 100 |
| Polestar Automotive Belgium BV | Belgium | 100 |
| Polestar Automotive Germany GmbH | Germany | 100 |
| Polestar Automotive Netherlands BV | Netherlands | 100 |
| Polestar Automotive Sweden AB | Sweden | 100 |
| Polestar Automotive Austria GmbH | Austria | 100 |
| Polestar Automotive Denmark ApS | Denmark | 100 |
| Polestar Automotive Finland Oy | Finland | 100 |
| Polestar Automotive Switzerland GmbH | Switzerland | 100 |
| Polestar Automotive Norway A/S | Norway | 100 |
| Polestar Automotive Korea Limited | South Korea | 100 |
| Polestar Automotive Australia PTY Ltd | Australia | 100 |
| Polestar Automotive (Singapore) Distribution Pte. Ltd. | Singapore | 100 |
| Polestar Automotive Ireland Limited | Republic of Ireland | 100 |
| PLSTR Automotive Portugal Unipessoal Lda | Portugal | 100 |
| Polestar Automotive Poland sp. zo. o | Poland | 100 |
| Polestar Automotive UK Limited | United Kingdom | 100 |
| Polestar Automotive Spain S.L | Spain | 100 |
| Polestar Automotive Luxembourg SARL | Luxembourg | 100 |
| Polestar Automotive Czech Republic s.r.o | Czech Republic | 100 |
| Polestar Automotive Italy s.r.l | Italy | 100 |
| Polestar Automotive France SAS | France | 100 |
| Polestar Manufacturing Holding Korea LLC | South Korea | 100 |
| Polestar Automotive (China) Group Co., Ltd. | People's Republic of China | 100 |
| Polestar Automotive China Distribution Co., Ltd. | People's Republic of China | 100 |
| Polestar Automotive Consulting Service (Shanghai) Co., Ltd. | People's Republic of China | 100 |
| Polestar Automotive Distribution (Taizhou) Co., Ltd. | People's Republic of China | 100 |
| Polestar Automotive (Chongqing) Co., Ltd. | People's Republic of China | 100 |
| Polestar Automotive (Singapore) Investment Pte Ltd | Singapore | 100 |

About Polestar

Polestar Automotive Holding UK PLC is the holding company of the Polestar Group, a pure play, premium electric vehicle brand headquartered in Gothenburg, Sweden, and listed on Nasdaq New York (PSNY). Polestar was established as a premium electric car brand by Volvo Cars and Geely in 2017 and designs and commercialises battery electric vehicles for markets across Europe, North America and Asia Pacific.

Polestar operates a capital efficient, asset light business model, focusing on research and development, design, software, sustainability, branding and commercial operations, while manufacturing is carried out through strategic partnerships. Polestar benefits from the technological, engineering and manufacturing capabilities of Volvo Cars and Geely and operates through a global corporate structure comprising the parent company and a network of subsidiaries supporting sales, distribution and group level functions in its markets.

Own workforce and organisational structure

Polestar's own workforce is primarily engaged in commercial operations, advanced engineering, research and development, software development, sustainability, marketing, finance, legal, IT and corporate governance functions. Core research and development activities are led from Gothenburg, Sweden, with personnel located across Europe, North America and Asia Pacific.

In line with its asset light operating model, Polestar does not directly employ manufacturing workforces at vehicle assembly plants. Instead, Polestar retains responsibility for vehicle design, technical specifications, supplier requirements, sustainability standards and governance, while production is undertaken by partner organisations. Polestar's organisational structure is designed to support global operations while enabling oversight of environmental and social risks, including risks related to modern slavery and forced labour, across its value chain.

As of December 31, 2025, Polestar employed 1,686 people globally (headcount).

| Total all employees | 2025 | 2024 | 2023 |
|-----------------------|-------|-------|-------|
| Total employees (HC)* | 1,686 | 2,261 | 2,517 |
| New hires | 252 | 266 | 606 |
| Rate of recruitment % | 15 | 12 | 24 |
| Employee turnover % | 36 | 24 | 19 |
| Non-employees | 175 | 286 | 484 |

*Total employees represents the number of individuals employed by Polestar at year-end, reported as headcount (HC). The figure reflects point-in-time headcount and excludes non-employees.

Global breakdown of employees



| North America 6% | 2025 | 2024 | 2023 |
|-----------------------|------|------|------|
| Total employees (HC) | 103 | 105 | 101 |
| New hires | 16 | 17 | 22 |
| Rate of recruitment % | 16 | 16 | 22 |
| Employee turnover % | 3 | 13 | 22 |
| Non-employees | 5 | 4 | 7 |

Number of employees per city (country)

- 12 Canada
- 91 USA



| EMEA 86% | 2025 | 2024 | 2023 |
|-----------------------|-------|-------|-------|
| Total employees (HC) | 1,457 | 1,835 | 2,066 |
| New hires | 210 | 203 | 500 |
| Rate of recruitment % | 14 | 11 | 26 |
| Employee turnover % | 35 | 24 | 14 |
| Non-employees | 170 | 272 | 470 |

Number of employees per city (country)

- 23 Austria
- 36 Belgium
- 28 Denmark
- 16 Finland
- 14 France
- 48 Germany
- 20 Italy
- 2 Luxemburg
- 47 Netherlands
- 33 Norway
- 5 Portugal
- 20 Spain
- 1,027 Sweden
- 31 Switzerland
- 107 United Kingdom



| Asia Pacific 8% | 2025 | 2024 | 2023 |
|-----------------------|------|------|------|
| Total employees (HC) | 126 | 321 | 350 |
| New hires | 26 | 46 | 84 |
| Rate of recruitment % | 12 | 14 | 21 |
| Employee turnover % | 71 | 26 | 41 |
| Non-employees | 0 | 10 | 7 |

Number of employees per country

- 24 Australia
- 77 China
- 24 South Korea
- 1 Singapore

About Polestar

Supply chain structure

Polestar's supply chain is global, multi tiered and automotive industry specific, spanning North America, Europe and Asia.

Polestar's vehicles are manufactured and assembled at partner operated manufacturing facilities:

- Polestar 2: Taizhou, China
- Polestar 3: Chengdu, China and South Carolina, USA*
- Polestar 4: Hangzhou Bay, China and Busan, South Korea
- Polestar 5: Wuhan, China and Chongqing, China (Start of production in 2026).

As of December 31, 2025, the partner operated vehicle assembly operations were supported by 672 suppliers providing components and materials. These suppliers have been sourced and contracted by our strategic manufacturing partners Volvo Cars and Geely. The majority of these suppliers are located in China, followed by Germany and Sweden, with the remainder distributed globally, primarily across Europe and North America. Component and parts contain critical raw materials such as aluminium, steel, battery materials (including nickel, cobalt, lithium, manganese, graphite and mica), electronics, polymers, textiles, leather and wool. The supply chain contains multiple tiers, geographies and sectors that are commonly associated with heightened risks of labour rights infringements, including modern slavery and forced labour.

Due to the multi-tiered and global nature of automotive supply chains, Polestar does not yet have full visibility beyond Tier 1 suppliers for all materials and components, particularly in upstream raw material extraction and processing. As part of Polestar's due diligence processes, we have mapped and traced selected high-risk materials. However, in supply chain segments where salient risks persist, additional measures are required to extend visibility and address risks. Improving transparency in upstream tiers therefore remains an ongoing due diligence priority.

In addition to the contract manufacturing supply base, Polestar engages directly with suppliers and business partners providing indirect goods and services to its own operations, including office supplies, consultancy services, logistics, transports and other operational support. As of the end of 2025, Polestar had identified 1,392 indirect suppliers.

Distribution

Polestar sells its vehicles through a combination of direct to customer, active selling partner and wholesale models, depending on the market. As of 31 December 2025, Polestar's vehicles were available in 28 markets globally across Europe, North America and Asia Pacific.

This organisational and supply chain structure reflects Polestar's operating model and forms the basis for its approach to identifying, assessing and addressing risks related to modern slavery and forced labour across its operations and value chain.

Markets

Australia
Austria
Belgium
Canada
China
Denmark
Finland
France
Germany
Hong Kong
Iceland
Ireland
Israel
Italy
Kuwait
Luxembourg
Netherlands
New Zealand
Norway
Portugal
Singapore
South Korea
Spain
Sweden
Switzerland
United Arab Emirates
United Kingdom
United States

About

HQ in Gothenburg, Sweden. Incorporated in the UK. Listed on the Nasdaq in New York, US (PSNY).

As of
Dec 31
2025

| | |
|--------------------------------|-------|
| Employees globally (HC) | 1,686 |
| Polestar Sales Points globally | 211 |
| Service Points | 1,243 |

Embedding responsible business conduct

Governance

The Board of Directors and its committees provide oversight of sustainability and modern slavery risks. The Nominating & Governance Committee oversees the sustainability strategy and due diligence; the Audit Committee oversees the Compliance & Ethics Programme and whistleblowing; and the Compensation Committee oversees human capital (including DEI). Oversight of modern slavery, forced labour and child labour risks is integrated into these existing governance and risk management structures, with escalation and mitigation aligned to Polestar’s overall sustainability and compliance frameworks. Day-to-day management sits with the CEO, supported by the Executive Committee (ExCom) and Group Management Team (GMT).

To support efficient decision-making, members of ExCom and the GMT meet in various forums. Sustainability is integrated into these weekly decision-making forums, enabling us to link sustainability topics with core processes and the overall business strategy.

The GMT plays a critical role in delivering strategic direction, monitoring performance, and making decisions to drive execution and performance. Polestar’s Head of Sustainability is a member of the GMT.

Each global function represented in the GMT is accountable for implementing action plans, working towards targets, and securing resources for the strategic initiatives within Polestar’s sustainability strategy.

Sustainability due diligence

We believe that driving sustainable development forward in practice means continuously upholding fundamental principles and conduct as a business, while always remaining agile and open to change, new knowledge, and innovation.

Our process for steering sustainability reflects the principle of due diligence and aligns with the OECD Due Diligence Guidance for Responsible Business Conduct. This means that we organise and act in a way that embeds responsible practices, continuously assess opportunities, risks, and actual adverse impacts on people and the environment, develop strategies, procedures, and processes that enable us to take action to mitigate or prevent identified risks and cease actual adverse impacts and enhance positive impacts, restore where possible damage caused, and continuously monitor and report on progress.

Our Sustainability strategy is deployed through strategic initiatives throughout our organisation, car programmes, and operations. Each strategic initiative is supported by an action plan that outlines the activities required to address identified risks and support positive contributions.

— Continuous improvement

Our understanding of modern slavery and forced labour risks is strengthened year on year through ongoing risk assessments, supplier engagement, audits, stakeholder dialogue and internal reviews, including our annual double materiality assessment. Insights from these processes are used to refine priorities, strengthen controls, improve data quality and adjust actions where needed. As regulatory expectations, industry practices and risk profiles continue to develop, Polestar remains committed to enhancing its due diligence processes and effectiveness over time.

Strategic initiatives addressing modern slavery and human rights risks

| Polestar initiative | Sustainability strategy |
|----------------------------------|--|
| Inclusive Workplace | The initiative is designed to drive change within the full workforce across all operations, aiming to mitigate negative human impact, with reporting to management. The Chief HR Officer holds accountability for HR-related topics and the Inclusive Workplace initiative and is part of Polestar’s executive management structure. |
| Supply chain transparency | Focused on increasing visibility across our value chain. It involves gaining clear, reliable insight into the origins, movement, and processing of materials – from raw material extraction to component manufacturing |
| Human Rights in the Supply Chain | Coordinated by our Procurement department in collaboration with our turnkey partners to monitor and track actions related to human rights in our supply chain. |
| Human Rights in Manufacturing | Led by the Manufacturing department, who will secure necessary resources and collaborate with our turnkey manufacturing partners to monitor and track actions related to human rights at the car assembly plants. |

Embedding responsible business conduct

Our policies

Polestar's Sustainability Policies and Codes of Conduct establish group-wide expectations for respecting human rights, safe working conditions and responsible business conduct. These policies guide our work to prevent forced labour, child labour, human trafficking and other labour rights violations, and they apply to all employees.

Our approach is grounded in international standards, including:

- The Universal Declaration of Human Rights
- The United Nations Convention on the Rights of the Child
- The ILO's fundamental conventions

We are also committed to observing the UN Global Compact's Ten Principles and conducting due diligence in line with OECD guidelines. Through our policies and directives, we define clear requirements for labour rights, responsible sourcing and due diligence, ensuring that expectations are consistently communicated across all parts of the business and extended through our global supply chains.

| Policy | Content |
|---|--|
| Code of Conduct | Polestar's Code of Conduct commits to fair employment conditions and equal opportunities, prohibiting discrimination, harassment, and child or forced labour. It sets principles for diversity, inclusion, fair pay, and a safe, healthy work environment, respecting freedom of association globally. |
| Sustainability Policy | Polestar's Sustainability Policy defines our commitment to respecting human rights, promoting safe and fair working conditions, and conducting business responsibly across all operations and supply chains. It outlines expectations for identifying, preventing, mitigating, and remediating adverse impacts on people and the environment. It embeds responsible business conduct throughout our organisation and aligns our work with evolving legal and regulatory requirements. In addition to the Sustainability Policy, our underlying Inclusion Directive details social sustainability and the topics of diversity, equality, inclusion and our statements on human rights. The Inclusion Directive emphasises comprehensive human rights due diligence and requires respect for communities' rights, including Indigenous Peoples and the principle of Free, Prior and Informed Consent (FPIC). |
| People Policy | <p>Polestar's People Policy ensures fair working conditions and equal treatment for all employees, guided by international human rights standards. It prohibits discrimination and harassment, guarantees safe and healthy workplaces, and respects work-life balance through compliance with ILO standards on working hours. Salaries and benefits meet or exceed legal and industry norms, ensuring living wages and social protections.</p> <p>In addition the People Policy, we have underlying directives with details regarding:</p> <ul style="list-style-type: none"> • Responsible Employer • Health, Safety and Wellbeing • Inclusive Workplace • Discrimination, Harassment and Bullying |
| SpeakUp Policy (grievance and whistleblowing) | Polestar's Speak Up Policy promotes an open culture where employees can safely report concerns about misconduct, discrimination, harassment, or working conditions. It provides secure and anonymous reporting channels, guarantees confidentiality and non-retaliation, and commits to fair investigations in line with legal requirements. |
| Position on Conflict Minerals | Our position on conflict minerals addresses the challenges linked to their mining, manufacturing and use, and lays out how Polestar works to manage conflict mineral risks within our global supply chains. |

Contractual requirements with business partners

Additionally, for every strategic sourcing and manufacturing partnership, we establish contractual expectations on how to manage and safeguard human rights, with the aim of driving continuous progress toward a more sustainable and equitable supply chain.

| Requirements | Content |
|---------------------------------------|---|
| Code of Conduct for Business Partners | <p>Sets out mandatory requirements for all suppliers and business partners, including explicit prohibitions on:</p> <ul style="list-style-type: none"> • forced or bonded labour, • child labour, • retention of identity documents, • recruitment fees charged to workers, and • uphold freedom of association and collective bargaining, • provide safe and healthy working conditions, • ensure non-discrimination and fair treatment, • conduct ongoing due diligence to identify, prevent and address human rights risks. • Grievance mechanism via Polestar's whistleblowing system Speak Up, accessible to own workers and externals <p>Acceptance of Polestar's Code of Conduct for Business Partners or similar principles is a key criteria to contract with a Business Partner.</p> |
| Sustainability requirements | In agreements with strategic business partners on our car programmes, we establish specific requirements with ambition to drive continuous improvement on sustainability and our focus areas: climate neutrality, circularity, transparency and inclusion |
| Contractual terms | Contractual terms include clauses related to respect for Human rights and prohibition of forced labour and child Labour, audit and access rights, corrective action mechanisms, and termination rights. |

[Read more →](#)

Sustainability Policies and Position papers | Polestar Ethics and Codes of Conduct | Polestar

Embedding responsible business conduct

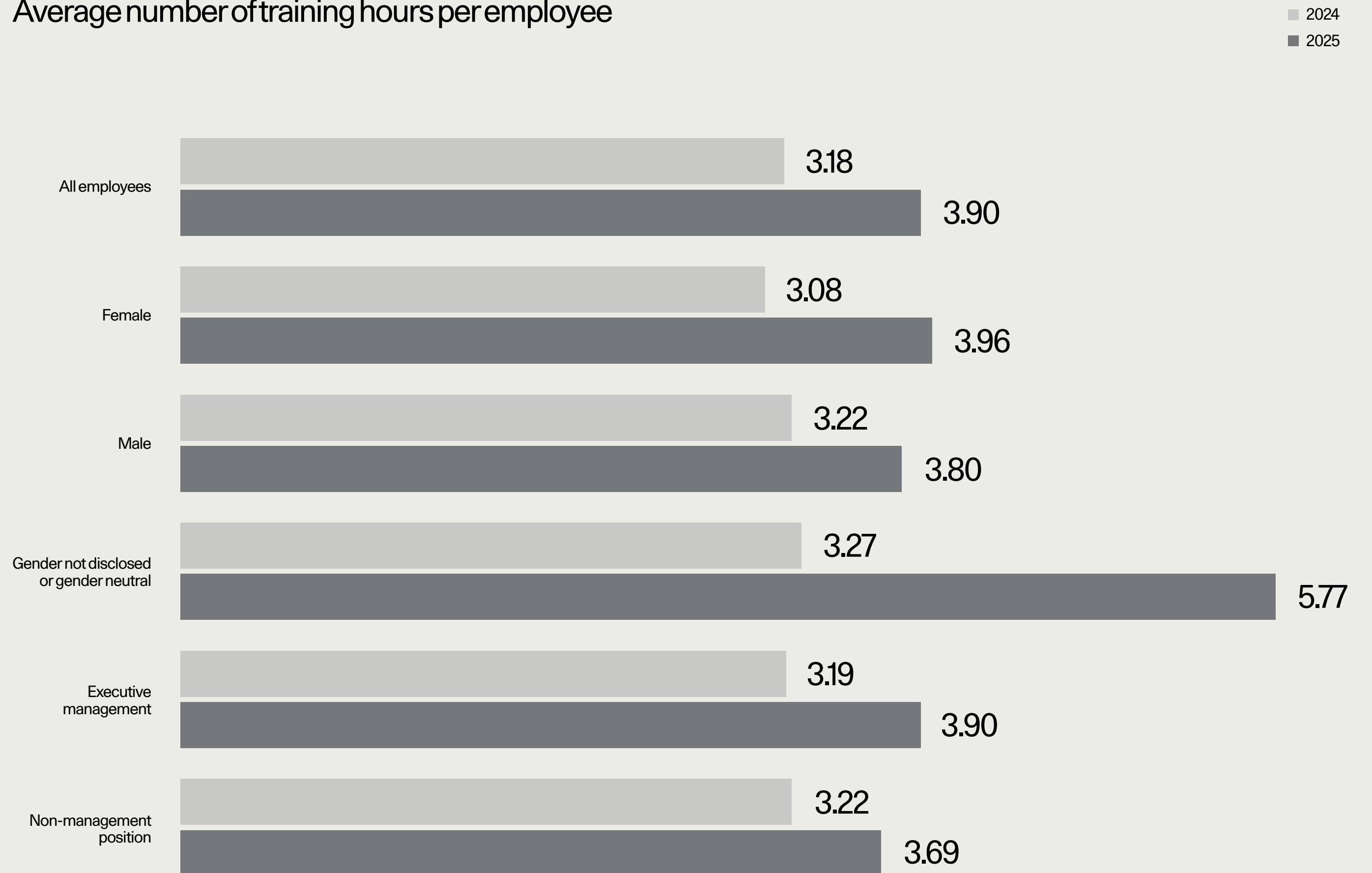
Training provided

Polestar employees are offered a variety of learning opportunities through the Polestar Learning Management System (LMS). The Training Corner on Polestar's intranet supports global participation by promoting available courses. In 2025, Polestar employees received 7,193.5 hours of training. Throughout the year, mandatory training was conducted for all employees on the Code of Conduct, Information Security and Procurement Policy, addressing key topics such as discrimination, human rights and security concerns to support a respectful, ethical and compliant workplace.

Polestar also provides training and awareness activities for relevant internal stakeholders, including Procurement, to support the effective implementation of sustainability and human rights requirements in the value chain. This includes training on the Supplier Code of Conduct, human rights due diligence processes, and risk assessment methodologies.

In addition, Polestar engages with suppliers to build capacity and support compliance with applicable standards, including guidance related to SAQ completion, conflict minerals due diligence and expectations for independent third party human rights audits. Given the material sustainability risks associated with battery supply chains, enhanced engagement and capacity building measures are applied with battery suppliers. Due to Polestar's asset light turnkey operating model, these activities are primarily conducted in collaboration with turnkey partners and through established contractual and governance mechanisms. Polestar will continue to strengthen training and capacity building initiatives within this operating model to support responsible practices across the value chain.

Average number of training hours per employee



Risk identification and risk management tools

Polestar conducts formal risk assessments on an ongoing basis across its operations and value chain, covering environmental, social and governance risks, including risks related to modern slavery, forced labour and child labour. These assessments include, among others, human rights due diligence, supply chain risk assessments, risk material evaluations, market risk assessments, and supplier screening processes.

Insights from these processes are consolidated and reviewed through Polestar's annual double materiality assessment (DMA), which provides a structured and comprehensive framework for identifying and assessing material impacts, risks, and opportunities. The DMA builds on earlier impact materiality assessments and supports the integration of sustainability related risks into business decision making. Following the first DMA conducted in 2024, the 2025 review was further expanded and more closely integrated with Polestar's enterprise risk management framework.

In addition to internal assessments, Polestar participates in industry associations, non governmental organisations and collaborative initiatives, which provide insights into systemic risks, emerging issues and evolving best practices across the automotive value chain. These external inputs, combined with internal analysis and supplier data, strengthen Polestar's risk identification processes and support a robust and reliable due diligence approach.

Identified material topics related to modern slavery, forced labour and child labour

| Topic | Sub-topic | Impact, Risk, Opportunity | Value chain | Description | Read more in Sustainability Report 2025 |
|----------------------------|---|--|--|---|---|
| Own workforce | Working conditions | <ul style="list-style-type: none"> Potential positive impact Potential negative impact | <ul style="list-style-type: none"> Own operations | Most employees are based in well-functioning labour markets with low risk of corruption, which means that the labour market institutions can develop legislative and policy frameworks, as well as deliver services that lead to well-functioning labour markets generating decent work opportunities. China, which accounts for 4.6% of our work force, is the only region assessed by RBA as being high risk, making the protection of our employees' human rights and the process to secure this is even more important in that market. Most of Polestar's employees and contractors are office and sales staff, with no directly employed personnel in manufacturing operations, which reduces the typical labour issues found in production settings | Own workforce, p 99-119 |
| | Equal treatment and opportunities for all | <ul style="list-style-type: none"> Potential positive impact Potential negative impact | <ul style="list-style-type: none"> Own operations | | |
| Workers in the value chain | Working conditions | <ul style="list-style-type: none"> Potential negative impact Risk | <ul style="list-style-type: none"> Upstream | Forced labour is prevalent across various tiers and regions, making the scope extensive. Within tier 1, 2, and 3 suppliers, concerns arise regarding excessive working hours and limited freedom of association. This also includes the vehicle assembly plants. Among tier 2 suppliers, such as process industries and smelters, health and safety risks become more pronounced. As distance from direct oversight increases, the risk of poor working conditions, inadequate wages, lack of social dialogue, child labour and lack of adequate housing rises. These issues are exacerbated by severe conditions in sectors like mining. Migrant workers, including domestic migrants, children, and minority groups, often face disproportionate risks. | Workers in the Value Chain p 120-129 |
| | Equal treatment and opportunities for all | <ul style="list-style-type: none"> Potential negative impact | <ul style="list-style-type: none"> Upstream | | |
| | Other work-related rights | <ul style="list-style-type: none"> Potential negative impact Risk | <ul style="list-style-type: none"> Upstream | | |
| Affected communities | Communities' economic, social and cultural rights | <ul style="list-style-type: none"> Potential negative impact | <ul style="list-style-type: none"> Upstream | Mining operations can degrade land and water resources, disrupt livelihoods, and undermine cultural heritage and social structures. Reports of land grabbing, coercion, and environmental contamination highlight the severity of these impacts. There is an increased risk of displacement, erosion of self-governance, loss of cultural heritage and sacred sites, and links to forced labour | Affected communities, p 130-136 |
| | Particular rights of Indigenous communities | <ul style="list-style-type: none"> Potential negative impact | <ul style="list-style-type: none"> Upstream | | |
| Business conduct | Corporate culture | <ul style="list-style-type: none"> Actual positive impact Actual negative impact Risk | <ul style="list-style-type: none"> Own operations | Operating in a complex global environment brings challenges such as managing corruption risk, cultural pressure, and transparent political engagement. By fostering integrity, strong compliance systems, and active advocacy for sustainable mobility, Polestar aims to mitigate these risks and strengthen resilience in the transition to a sustainable future | Business conduct, p 145-149 |
| | Corruption and bribery | <ul style="list-style-type: none"> Potential negative impact Risk | <ul style="list-style-type: none"> Own operations Upstream | | |
| | Political engagement | <ul style="list-style-type: none"> Actual positive impact Opportunity | <ul style="list-style-type: none"> Own operations | | |



Actions Introduction

Own workforce

Polestar works proactively to prevent, mitigate and address risks of modern slavery, forced labour and child labour across our value chain. Our actions address both identified risks and potential future risks, and are informed by our annual double materiality assessment, supplier performance data, and global regulatory developments. Because the most significant risks occur upstream in raw material extraction and processing, much of our work focuses on improving supply chain transparency, strengthening due diligence, and collaborating with suppliers and industry partners to address systemic issues.

Polestar's actions to address salient human rights risks are implemented through its sustainability strategy and strategic initiatives. Comprehensive information on these actions and their implementation is disclosed in the Polestar Sustainability report 2025.

The Inclusive Workplace initiative is designed to drive change within the full workforce across all operations, aiming to mitigate negative human impact, with reporting to management.

Polestar strives to be a responsible employer of choice by creating job opportunities with equal treatment for all and fair employment terms that comply with statutory requirements. Polestar's ambitions include work-life balance, fair remuneration, and a healthy environment where individuals can thrive, feel safe, and where freedom of association and collective bargaining are encouraged. The objective is for all employees to feel comfortable, connected, and valued for their contributions to the workplace. Polestar works to ensure equal treatment and opportunities; the ambition is to become the world's most diverse and inclusive electric vehicle company.

Own workforce

| Material topics | Actions | Metrics | Goals and targets |
|---|--|---|--|
| Working conditions | <ul style="list-style-type: none"> Continuous performance management with mandatory touchpoints and 360° feedback Monthly pulse check surveys via Peakon to assess engagement, inclusion, workload, and well-being. Use of Learning Management System (LMS) and training programmes for competence development Implementation of Health, Safety and Wellbeing Directive, risk assessments, and Work Environment Committees Implementing Nilo – a digital tool designed to help prevent burnout, build a stress resilient workforce, and supports mental health Provision of social protection, flexible work arrangements, and work-life balance support | <ul style="list-style-type: none"> Pulse-check average score Inclusion index Training hours delivered Health & Safety: <ul style="list-style-type: none"> - notifiable or lost-time accidents - work-related ill-health - fatalities Share of workforce covered by collective bargaining | <ul style="list-style-type: none"> Maintain safe, healthy, and fair working conditions Achieve Inclusion Index of 9.0 Support work-life balance and fair remuneration across all markets |
| Equal treatment and opportunities for all | <ul style="list-style-type: none"> Inclusive Workplace Directive implementation across recruitment, development, retention, and leadership Monthly inclusion-focused questions within pulse-check surveys Gender wage gap analysis and pay equity reviews Unbiased recruitment processes and leadership development initiatives SpeakUp channels and anti-discrimination policies supporting psychological safety | <ul style="list-style-type: none"> Inclusion Index Gender balance among new hires Female representation in workforce and leadership Gender pay gap results Number of discrimination/harassment reports via SpeakUp | <ul style="list-style-type: none"> 50/50 gender balance among new hires 40% female representation in global workforce and leadership Inclusion Index target of 9.0 Zero tolerance for discrimination, harassment, and bullying |



Actions Workers in the value chain

Progress for each car programme, the manufacturing operations, and supplier management is monitored and tracked by our human rights initiatives. Through responsible sourcing, together with our business partners and suppliers, we track results and actions with the purpose of mitigating negative human rights impacts in our value chain. Polestar is also part of several multistakeholder initiatives to have an even greater impact when we inspire and collaborate with others to drive change.

Workers in the value chain

| Material topics | Actions | Metrics | Goals and targets |
|---|---|--|--|
| Working conditions | <ul style="list-style-type: none"> Our KPIs are connected to our human rights due diligence process as defined by OECD: <ol style="list-style-type: none"> 1) Embed responsible business practice 2) Risk management 3) Take action to cease, prevent, or mitigate potential negative impact and/or create positive impact | <ul style="list-style-type: none"> % of suppliers that have signed agreements on human rights and Code of Conduct for Business Partners % of suppliers completed Sustainability Assessment Questionnaire (SAQ) with score >70 and regional risk assessment % of suppliers in high-risk regions with third-party on-site human rights audit | <ul style="list-style-type: none"> 100% |
| Equal treatment and opportunities for all | | | |
| Other work-related rights | | | |

Actions Affected communities

Our strategy is shaped by a thorough understanding of risks across our value chain and guided by our principles and strategic focus areas. We are committed to Inclusion, Climate neutrality, Circularity and Transparency. We recognise that systemic challenges, such as climate change, human rights risks, and resource scarcity, cannot be solved in isolation. Therefore, we actively engage stakeholders through multistakeholder initiatives that bring together businesses, civil society, governments, and affected communities.

Affected communities

| Material topics | Actions | Metrics | Goals and targets |
|--|--|--|--|
| Communities' economic, social, and cultural rights | <ul style="list-style-type: none"> Strengthened traceability and risk assessment of high-risk materials and regions Human rights due diligence across the value chain Participation in multistakeholder initiatives (RMI, RBA, IRMA, Better Mining, Drive Sustainability) and their engagement with local communities to address systemic risks Use of their grievance mechanisms accessible to affected communities | <ul style="list-style-type: none"> Number of identified incidents involving Indigenous rights Conflict mineral reporting including supplier response rate and no of conformant smelters Mapping of high-risk materials and high-risk areas New material topics and further metrics will be developed | <ul style="list-style-type: none"> Strengthen supply chain transparency and traceability Increase circular and recycled material use to reduce reliance on high-risk mining Promote RMAP validated conflict-free smelters for 3TG minerals Expand supplier participation in IRMA, RMI. Support ASM through Better Mining project Continue human rights due diligence focusing on high-risk raw materials |
| Particular rights of Indigenous communities | <ul style="list-style-type: none"> Supplier requirements to respect Indigenous rights and FPIC NGO engagement to address Indigenous rights risks, including uncontacted tribes Promotion of IRMA standards on Indigenous rights and participatory processes | <ul style="list-style-type: none"> Number of identified incidents involving Indigenous rights Mapping of high-risk materials and high-risk areas | <ul style="list-style-type: none"> Strengthen supply chain transparency and traceability Increase circular and recycled material use to reduce reliance on high-risk mining Expand supplier participation in IRMA Continue human rights due diligence focusing on high-risk raw materials |



Actions Business conduct

For Polestar, operating across a global value chain demands a strong corporate culture anchored in our codes of conduct. With products reliant on an international network of suppliers and subcontractors, we prioritise upholding the highest ethical standards while continuously advancing transparency and traceability throughout the supply chain.

Our approach to responsible business conduct focuses on preventing and mitigating modern slavery risks in our operations and supply chains. This includes policies prohibiting forced labour and child labour, supplier due diligence processes, contractual controls, responsible purchasing practices, and accessible grievance mechanisms. These measures are risk-based and aligned with our assessment of exposure in higher risk regions and sectors

Business conduct

| Material topics | Type | Value chain | Policies | Actions | Metrics | Targets |
|------------------------|--|----------------------------|--|---|---|--|
| Corporate culture | Actual positive impact Actual negative impact Risk | Own operations | <ul style="list-style-type: none"> • People Policy • Code of Conduct • Speak Up Policy • Fair competition Policy • Anti-corruption Policy • Conflict of Interest Policy • Sanctions and Export control Policy • Delegation of Authority Policy | <ul style="list-style-type: none"> • Mandatory Code of Conduct training • Employee engagement monitored via Peakon survey and performance management • SpeakUp channels promoting reporting and ethical behaviour | <ul style="list-style-type: none"> • Employee engagement survey results • Number of SpeakUp reports • Code of Conduct training completion | <ul style="list-style-type: none"> • Foster a culture of trust, integrity, and ownership • 100% completion of mandatory Code of Conduct training |
| Corruption and bribery | Potential negative impact Risk | Upstream Own operations | <ul style="list-style-type: none"> • People Policy • Code of Conduct • Code of Conduct for Business Partners • Anti-corruption Policy • Speak Up Policy • Conflict of Interest Policy • Delegation of Authority Policy | <ul style="list-style-type: none"> • Annual Code of Conduct training, covering anti-corruption, for all employees which is part of the onboarding process • Business Partners Due Diligence • Internal controls monitored via Audit Committee; Fraud and corruption risk assessments | <ul style="list-style-type: none"> • Reported corruption incidents • Legal cases related to corruption • Annual Code of Conduct/anti-corruption communication and training | <ul style="list-style-type: none"> • Zero tolerance for corruption and bribery |

Assessing effectiveness of actions Introduction

Polestar assesses the effectiveness of its actions to prevent and address modern slavery, forced labour and child labour through an OECD aligned due diligence process, which is embedded across governance, risk management and sustainability reporting. Effectiveness is monitored through a combination of qualitative oversight and quantitative performance indicators, focusing on whether identified risks are being addressed and whether actions contribute to improved outcomes for workers and affected communities.

Progress is reviewed through Polestar's strategic sustainability initiatives, including Human Rights in Manufacturing, Human Rights in the Supply Chain and Inclusive Workplace, with regular reporting to executive management and the Board. Key inputs into this assessment include results from supplier due diligence processes, risk assessments, audit outcomes, grievance mechanisms, employee engagement data and training completion rates.

Performance is tracked using defined metrics and targets, which are reviewed annually as part of Polestar's double materiality assessment and sustainability reporting cycle. Changes in risk exposure, coverage of due diligence activities and maturity of management systems are used as indicators of effectiveness over time.

Detailed performance data, year-on-year trends, methodologies and programme level KPIs are disclosed in Polestar's Sustainability report 2025. This Statement provides a summary of selected indicators most relevant to modern slavery and forced labour risks.



Assessing effectiveness of actions Key performance indicators

Polestar uses selected quantitative indicators to assess the effectiveness of actions to prevent and mitigate risks of modern slavery, forced labour and child labour across its operations and value chain. These indicators focus on coverage, risk prioritisation and follow up rather than outcomes alone.

Own workforce

- 1,188 of 1,686 employees (70%, 2024: 51%) covered by collective bargaining agreements. Currently, the countries with collective bargaining agreements are Austria, Belgium, Finland, Italy, the Netherlands, Spain, and Sweden.
 - 100% of employees completed mandatory Code of Conduct and human rights training, with additional role specific training for relevant functions such as Procurement.
- Fair remuneration
- All employees receive working conditions that comply with statutory requirements, including written information in an easily understandable language about their terms of employment, salaries, and benefits before starting employment.
 - No employees are required to deposit identity papers at the start of employment and all are free to leave after a notice period, as required by law and contract.
 - Salaries and benefits at Polestar are aligned with legal or industry standards and are always equal to or above the defined living wage.
 - All employees are covered by a pension or employee savings trust plan and insurance benefits, provided either by Polestar or another entity.
 - Information on salaries and benefits is accessible to all employees individually in accordance with applicable law.
 - All employees receive details of their salaries for each pay period.

- No salary deductions are permitted without the employee's express permission, unless provided for by national law, collective labour agreements, or in accordance with the employee's terms of employment.
- All Polestar employees, as well as non-employees in all countries where we have operations, are covered by social protection against loss of income due to major life events, either through public programmes or through benefits offered by the company.
- We comply with local labour laws and offer minimum or higher vacation days each year.

Workers in the value chain

— Vehicle assembly plant manufactures

- 100% of our strategic sourcing and manufacturing partners have signed agreements on the core principles of human rights and the Code of Conduct, including requirements forbidding child labour and forced labour.
- 60% of vehicle manufacturing plants are assessed to be in high-risk regions concerning human rights issues such as child labour, forced labour, freedom of association, and collective bargaining.
- 3 plants are in progress for conducting RBA VAP audits.

— Direct material suppliers to Polestar's car programmes

- 100% (2024: 99%) of suppliers have signed agreements on core principles of human rights and the Code of Conduct, including requirements for no child labour and no forced labour.
- 82% (2024: 79%) of all suppliers have completed a SAQ verified by the Drive Sustainability Initiative.
- 78% (2024: 72%) of all suppliers have a SAQ score >70%.
- 100% (2024: 100%) of all suppliers have undergone screening against trade sanctions.
- 81% (2024: 78%) of suppliers are assessed to be in high-risk regions concerning human rights issues such as child labour, forced labour, freedom of association, discrimination, and collective bargaining.
- 43% (2024: 34%) of all suppliers in high-risk regions have a valid third-party on-site human rights audit. The most frequent non-conformities found during on-site audits are concerning excessive working hours, as well as concerning wages and benefits. Together with our business partners, we are monitoring corrective action plan (CAP) status to ensure improvements are implemented.

— Modern slavery, forced and compulsory labour

- 97% (2024: 99%) of suppliers with a completed SAQ, verified by Drive Sustainability, have a policy of no forced or compulsory labour.
- 100%* (2024: 99.9%) of suppliers in high-risk regions with third-party on-site human rights audits have no priority findings related to forced and compulsory labour. Any findings are followed up with business partners and suppliers according to audit routines.

— Child labour and protection of young workers

- 97% (2024: 99%) of suppliers with a completed SAQ, verified by Drive Sustainability, have a policy for no child labour.
- 99%* (2024: 100%) of suppliers in high-risk regions with third-party on-site human rights audits have no priority findings of child labour or young workers exposed to hazardous work. Any findings are followed up with business partners and suppliers according to audit routines.

— Freedom of association and collective bargaining

- 97% (2024: 99%) of suppliers with a completed SAQ, verified by Drive Sustainability, have a policy of freedom of association.
- 100%* (2024: 100%) of suppliers in high-risk regions with third-party on-site human rights audits have no priority findings of violations of freedom of association and collective bargaining. regions with third-party on-site human rights audits have no priority findings of child labour or young workers exposed to hazardous work. Any findings are followed up with business partners and suppliers according to audit routines.

— Equal opportunities and no discrimination

- 97% of suppliers with a completed SAQ, verified by Drive Sustainability, have a policy on equal opportunities and no discrimination.
- 100%* of suppliers in high-risk regions with third-party on-site human rights audits have no priority findings related equal opportunities and no discrimination. Any findings are followed up with business partners and suppliers according to audit routines.

— Our indirect purchases

- Polestar identified 30 new suppliers, of which 80% were screened for trade sanctions, human rights, and human trafficking.
- There are an additional 211 business partners, of which 93% were screened for trade sanctions, human rights, and human trafficking. No business partners were identified as having significant actual or potential negative social impacts that resulted in the termination of relationships following the assessment.
- 1,392 identified indirect suppliers. Of these, 661 IDP suppliers, 47%, have been screened against sanctions, watch list and adverse media, including human rights and human trafficking matters. No IDP suppliers with high risk were terminated or not selected during the reporting period due to risks deemed unacceptable.

*These figures are only for PS2 and PS3. Correct data missing for PS4 and PS5 in 2025, we will aim to improve this.

Assessing effectiveness of actions Key performance indicators

Affected communities

- Critical raw materials assessed using Polestar's risk material framework, covering human rights, labour, governance, and environmental risks.
- Progress monitored through implementation of traceability or supply chain mapping for high risk materials.
- Polestar's latest Conflict Mineral Report shows a 100% response rate for in-scope tier 1 suppliers, with 63% of smelters being RMAP conformant.

[Read more →](#)
Ethics and Codes of Conduct | Polestar

Polestar 2

Polestar 2 is manufactured by Volvo Cars and equipped with a battery from CATL. Conflict minerals, including tin, tantalum, tungsten, and gold, are reported through the Conflict Minerals Reporting Template (CMRT) via the Assent platform.

Traceability of battery materials

The traceability of CATL batteries involves a collaboration between Volvo Cars and Polestar, using Circular as the traceability platform provider to track the following materials:

- Nickel
- Cobalt
- Lithium
- Mica
- Graphite*

Polestar 3

Polestar 3 is manufactured by Volvo Cars, with batteries supplied by CATL. Conflict minerals, including tin, tantalum, tungsten, and gold, are reported through the Conflict Minerals Reporting Template (CMRT) via the Assent platform.

Traceability of battery materials

Traceability of CATL batteries involves a collaboration between Volvo Cars and Polestar, using Circular as the traceability platform provider to track the following materials:

- Nickel
- Cobalt
- Lithium
- Mica
- Graphite*

Polestar 4

Polestar 4 is manufactured by Geely, with batteries from CATL. Conflict minerals, including tin, tantalum, tungsten, and gold, are reported through the Conflict Minerals Reporting Template (CMRT) via the Assent platform. For our battery risk materials, we have the below setup.

Traceability of battery materials

CATL battery traceability is conducted through supply chain mapping by Geely and CATL for the following battery materials:

- Nickel
- Cobalt
- Lithium
- Mica
- Graphite*
- Manganese
- Aluminium (can and foil)
- Copper (foil)

Polestar 5

Polestar 5 is developed by Polestar and manufactured by Geely with batteries supplied by SK On. Conflict minerals, including tin, tantalum, tungsten, and gold, will be reported through the Conflict Minerals Reporting Template (CMRT) via the Assent platform starting in 2026.

Traceability of battery materials

Traceability for SK On battery risk materials will begin in 2026 for the following materials:

- Nickel
- Cobalt
- Lithium
- Mica
- Manganese
- Graphite*
- Aluminium
- Copper



Assessing effectiveness of actions Key performance indicators

Memberships

| Organisation | Topic | Commitment | Description |
|-------------------------------------|----------------------------------|------------------------|---|
| Better Mining | Mining | Member | Delivers ESG improvements through the establishment of better practices across the ASM, Artisanal and Small-scale Mining sector. Better Mining works directly with artisanal and small-scale mining (ASM) sites to improve working conditions. Embedding safer and more equitable conditions across this complex segment of the global mining sector is crucial. Initiatives like Better Mining, which involve diverse stakeholders to identify risks and implement mitigation actions, are highly valued. These sites are not directly linked to Polestar's supply chain. |
| Drive Sustainability | Automotive | Support member | Enhance sustainability throughout the automotive industry by leveraging a common voice and by engaging with suppliers, stakeholders and related sectors on impactful activities. The Drive Sustainability partnership aims to enhance sustainability across the automotive supply chain by promoting a common approach within the industry and integrating sustainability into the overall procurement process. The goal is twofold: to ensure that all individuals involved in manufacturing vehicles or components, or providing services, are treated with dignity and respect at work, while minimising the environmental impact of the industry. |
| IRMA | Mining | Member | IRMA, The Initiative for Responsible Mining Assurance, a voluntary certification system for large-scale mines. IRMA supports a practical vision for the mining industry that upholds human rights and respects the aspirations of affected communities. Through independent, third-party audits of mines worldwide, using its Standard for Responsible Mining, IRMA promotes safe, healthy workplaces, minimises environmental harm, and leaves positive legacies. Rigorous IRMA audits require publicly announced on-site visits and broad stakeholder engagement, including affected communities. Investors and buyers who encourage mining companies to engage in IRMA's independent third-party assessment and transparent sharing of results support responsible sourcing in mining. |
| Responsible Business Alliance (RBA) | Industry coalition (electronics) | Affiliate member | Collaborate to improve working and environmental conditions and business performance through leading standards and practices. As an Affiliate Member, we support the RBA in driving sustainable value for workers, the environment, and business across the global supply chain. Collaboration with members, suppliers, and stakeholders aims to improve working and environmental conditions through leading standards and practices. We are committed to aligning our own operations with the provisions of the RBA Code of Conduct, and we encourage tier-one suppliers to do the same. |
| Responsible Labour Initiative | Industry coalition (electronics) | Part of RBA membership | Part of RBA with objective is to implement forced labour due diligence in the supply chain. Collaboration with the RBAs Responsible Labor Initiative focuses on ensuring that the rights of workers vulnerable to forced labour in global supply chains are consistently respected and promoted. To accelerate change, due diligence must be harmonised across multiple industries that share recruitment supply chains, driving labour market transformation through collective action. |
| Responsible Minerals Initiative | Mineral smelting and processing | Part of RBA membership | Purpose to implement minerals supply chain due diligence. We work with RMI to support the responsible sourcing of minerals. By providing companies with the necessary tools and resources to enhance compliance, RMI envisions mineral supply chains contributing positively to socio-economic development globally. The Initiative acts as an umbrella organisation for the voice of progressive industry, supporting best practices in mineral sourcing and convening stakeholders to continually shape dialogue. |

Remedy and grievance

Suspicious of severe violations can be reported through the global whistleblower system, SpeakUp, which guarantees anonymity and complies with the EU's Whistleblower Directive (Directive (EU) 2019/1937). Incidents are initially reviewed in accordance with the SpeakUp Policy and the Compliance Investigation Procedure. The Compliance and Ethics function assesses whether the incoming report could constitute a potential severe violation and if it is concrete enough to warrant investigation. External cases are managed by the Compliance and Ethics team, with external advice sought if necessary for the individual case.

- As of 2025, the whistleblowing system has not recorded any human rights violations within the supply chain.

Ongoing efforts are essential to ensure that any potential violations are reported and that the importance of reporting such incidents is widely understood.

As part of the RBA, RMI, and IRMA membership, and in addition to the internal complaints' procedure, support is also extended to the RBA, RMI, and IRMA third-party multistakeholder initiatives and

their grievance mechanisms, aiming to improve supply chain grievance processes. Their grievance channels are made available to workers during on-site audits. Awareness of these grievance channels is promoted through supplier communication and audit-related engagement.

- As of the reporting year, we have not been made aware of any supply chain cases raised through these member organisation channels related to Polestar's value chain.

If an impact on human rights were to occur, Polestar places great importance on providing effective response remedies. In such cases, efforts are made to update systems, due diligence processes, and practices to prevent similar adverse impact in the future.

Further insights of reported incidents can be found in the Sustainability report 2025, pages 147-148.

Administrative details and approvals

This Statement is issued as a joint Modern Slavery, Forced Labour and Child Labour Statement for the reporting period from 1 January to 31 December 2025. It has been reviewed and approved by the governing bodies of the relevant reporting entities and is made in accordance with the requirements of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cth), and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

The Statement applies to Polestar Automotive Holding UK PLC, Polestar Automotive UK Ltd., Polestar Automotive Australia Pty Ltd., and Polestar Automotive Canada Inc., and is published on polestar.com. It is also submitted to, and published in, the relevant government registries and submission portals in each jurisdiction, as required by applicable legislation.

United Kingdom

(Modern Slavery Act 2015, section 54)

This Statement has been approved by the Board of Directors of Polestar Automotive Holding UK PLC and is published in accordance with section 54 of the UK Modern Slavery Act 2015.

Australia

(Modern Slavery Act 2018 (Cth))

This Statement is a joint statement prepared in accordance with section 14 of the Australian Modern Slavery Act 2018 (Cth). It has been approved by the principal governing body of the higher entity that controls the covered reporting entities. Consultation with the covered entities has been undertaken in accordance with section 16(1)(f) of the Act.

Canada

(Fighting Against Forced Labour and Child Labour in Supply Chains Act)

This Statement contains the information required under Part 2, section 11(3) of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. It has been approved by the appropriate governing body(ies) of the reporting entities and is submitted together with the required signed attestation.

Signatures and attestations

Formal approvals and attestations required under the applicable legislation have been obtained and are retained in accordance with Polestar's internal governance procedures. Signed attestations are submitted to the relevant authorities as required.

Do you have questions or comments?
Please contact us at media@polestar.com
or ir@polestar.com.