

Account of due diligence assessments 2024

This report is, in accordance with the Norwegian Transparency Act, an account of due diligence assessments performed in Hurtigruten Group in the period 1st January to 31st December 2024. The following companies are covered by this report: Hurtigruten Group AS, Hurtigruten Norway AS, Hurtigruten Global Sales AS, Hurtigruten Global Services AS, Hurtigruten Destinations AS, Hurtigruten Coastal AS, Hurtigruten Sjø AS and Hurtigruten Coastal Fleet AS.

1. Introduction

The Norwegian Transparency Act (the “**Transparency Act**”) entered into force on 1st July 2022. The Transparency Act shall promote enterprises’ respect for fundamental human rights and decent working conditions. The Transparency Act applies to larger enterprises that are resident in Norway and that offer goods or services in or outside Norway. In accordance with the Transparency Act Sections 2 and 3, the following companies in Hurtigruten Group are covered by this Act:

- Hurtigruten Group AS (“Hurtigruten Group”)
- Hurtigruten Norway AS, Hurtigruten Coastal AS, Hurtigruten Sjø AS, Hurtigruten Coastal Fleet AS, Hurtigruten Global Services AS, Hurtigruten Global Sales AS and Hurtigruten Destinations AS, (collectively “Hurtigruten”)

In December 2024, Hurtigruten Group entered into an agreement to sell the Hurtigruten Expeditions business area (companies and assets constituting such business area, collectively referred to as “**HX**”) to a new group of shareholders. The transaction was completed on 12 February 2025. HX consists among other things of the following Norwegian legal entities: Hurtigruten Expeditions AS, Hurtigruten Expedition Cruises AS, Hurtigruten Expedition Crew AS, Hurtigruten Expedition Fleet AS and Explorer 2 AS. These entities were the part of the scope for Hurtigruten Group’s account of due diligence for 2023.

This document is a joint account of due diligence carried out by Hurtigruten Group and Hurtigruten (excluding, for the avoidance of doubt, HX) for the period 1st January 2024 to 31st December 2024. Significant developments that have occurred between the end of the reporting period and the publishing of this report are also included. Most significantly, the divestment of HX has reduced the risk of matters occurring which could have an adverse impact on human rights and decent working conditions in Hurtigruten Group’s operations and supply chain. We refer to HX for the 2024 account of due diligence for HX.

The purpose of this document is to provide information to the public regarding key findings from our due diligence and how we address risks to, and adverse impacts on, human rights and decent working conditions in our operations and supply chain.

Section 2 of this document contains a description of the governance in Hurtigruten Group and Hurtigruten related to the Transparency Act. This includes an overview of our organization, core service offering, roles and responsibilities, and guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions. Our due diligence approach and key findings are described in Section 3. Section 4 provides a summary of implemented and planned measures to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures. Section 5 includes a list of resources used by the Group in ensuring compliance with the Transparency Act.

2. Governance

2.1. Organization and areas of operation

Hurtigruten Group comprises two main business units. Hurtigruten and Hurtigruten Destinations offer experiences along the Norwegian coast, and Svalbard to travellers from all over the world. Hurtigruten has its headquarters in Oslo. Hurtigruten Svalbard is the main company under Hurtigruten Destinations and has its headquarters in Longyearbyen on Svalbard. Hurtigruten has offices and operations in Hamburg, Tromsø, Paris, Seattle, Melbourne, Tallinn, Hong Kong and Kirkenes serving the most important and emerging markets.

Figure 1 provides an overview of the main companies in Hurtigruten Group. The companies highlighted in grey are covered by the Transparency Act (ref. Transparency Act Section 2).

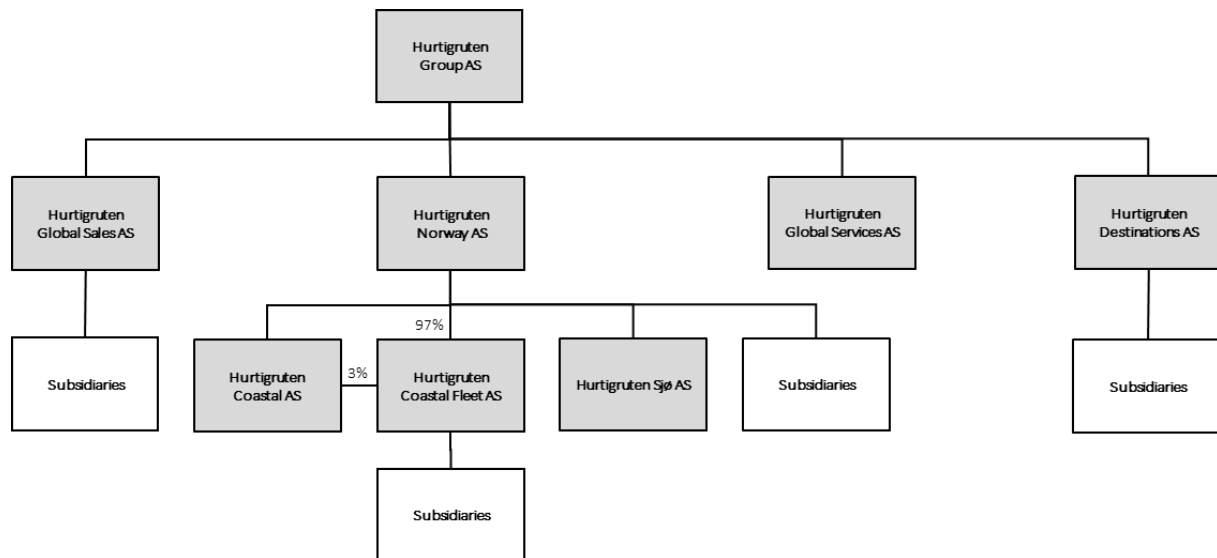


Fig. 1: Hurtigruten Group company structure. Companies in grey are covered by the Transparency Act.

2.2. Our core service offering

Our core offering is travel experiences to customers, via ships and hotels, as well as additional services pre- and post-travel. Hurtigruten operates our cruise services along the Norwegian coast under the state contract as well as our fully commercial Signature sailings. The Group's onshore hotel services are operated by Hurtigruten Svalbard AS, a subsidiary of Hurtigruten Destinations AS. Figure 2 provides an overview of our core service offering and support functions.

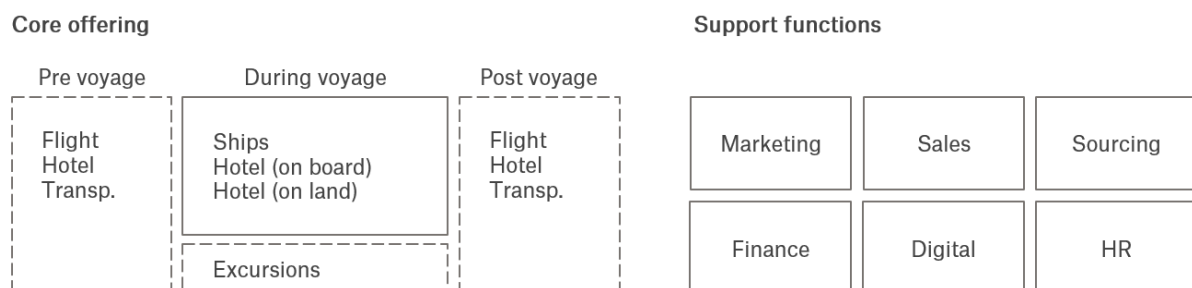


Fig. 2: Core offering and support functions in Hurtigruten Group

2.3. Roles and responsibilities

The Board of Directors of each company is responsible for compliance with the Transparency Act. This means that the Board of Directors inter alia are required to ensure responsible processes in the organization and to approve and sign our account of due diligence each year prior to publication.

The CEO of each group company have the overall responsibility for execution. The CFO of Hurtigruten have process responsibilities as outlined in Table 1. An internal working group consisting of Legal & Risk Management, Procurement, ESG, and Communications is established to strengthen collaboration, coordination and preparedness related to the Transparency Act.

Requests for information sent to press@hurtigruten.com are received by the Communications department. In cases where such requests are sent to and received by other departments, e.g. Procurement, the recipient is responsible for forwarding the request to Communications.

#	Process	Responsible	Support
1	Duty to carry out Due Diligence		
1a	Map and identify actual and potential negative impacts	Procurement	Legal, Finance
1b	Initiate appropriate measures to mitigate and stop negative impacts	Procurement	Legal, Finance
1c	Track and report step 1a and 1b on a quarterly basis to the Board	Procurement	Legal, Finance
2	Duty to account for due diligence (by June 30th each year)		
2a	Give a general description of the organization and operations	Legal	Procurement, Comms
2b	Inform about negative impacts and significant risks of negative impacts	Legal	Procurement, Comms
2c	Inform about the measures taken (1b)	Legal	Procurement, Comms
3	Right to information		
3a	Any person has the right to information on how we address section 1 ¹	Legal	Comms
3b	Provide an adequate response to 3a within three weeks	Legal	Comms

Table 1: Governance structure in Hurtigruten Group related to the Transparency Act.

All employees in Hurtigruten Group are responsible for, and encouraged to, report unwanted incidents through our Whistleblowing channel. Such incidents include, but are not limited to, risks and incidents with adverse impact on fundamental human rights and decent working conditions. More information about our Whistleblowing Policy is located on our website under Reports and Policies.

2.4. Guidelines and procedures

The following five elements are key in our approach to ensure human rights in our supply chain:

- Risk Assessment:** We conduct human rights risk assessments across our entire value chain, including direct operations and business partners. These assessments include factors such as geographic location and industry-specific risks.
- Engagement and Collaboration:** We actively engage with stakeholders throughout our value chain. Through dialogue and collaboration, we seek to understand and address human rights challenges collectively.
- Supplier Due Diligence:** We integrate human rights considerations into our supplier selection, evaluation, and monitoring processes. Our Supplier Code of Conduct sets forth our expectations regarding human rights, labor practices, environmental stewardship, and ethical business conduct.
- Remedy Mechanisms:** We have established accessible and effective grievance mechanisms to receive and address complaints related to human rights violations. These mechanisms provide affected individuals with channels for reporting concerns and seeking redress and facilitate implementation of appropriate remedies in a timely manner.
- Continuous Improvement:** We annually review and update our Human Rights Due Diligence Framework to reflect evolving standards, best practices, and stakeholder expectations. We monitor our performance, measure the effectiveness of our initiatives, and strive for continuous improvement in our work with human rights.

Hurtigruten Group has a set of governing documents and tools to support our work to ensure fundamental human rights and decent working conditions. These are applicable for all companies covered by this report.

¹ This right can be denied if certain requirements are met as per Section 6 a-d of the Transparency Act.

Our Code of Conduct, Human Rights Policy, Anti-Corruption Policy, Procurement Policy, Diversity, Equity and Inclusion Policy, Freedom of Association Policy and Remuneration Policy reflect our values and include expectations and requirements regarding our behaviour and working conditions. Breaches of these policies are followed up by the line organization, Legal and HR.

Our Supplier Code of Conduct has been communicated to our suppliers in several waves and is available on our website. It covers labour rights (modern slavery, freedom of association, child labour, discrimination etc.), health and safety, corruption, animal welfare and the environment. Procurement is qualifying and following up our suppliers, including actual or potential breaches to human rights. This is further described in our Procurement Policy.

Our procurement analytics tool supports the procurement teams in ensuring sufficient contracts are in place and enable structured analyses of suppliers and business partners with regards to country- and industry risk, and in turn increase our ability to influence our suppliers' behaviour.

We believe in a culture with open dialogue, and we encourage all our employees to raise any concerns to their manager or through our whistleblowing mechanism. The whistleblowing process is governed by our Whistleblowing Policy. Cases reported through our whistleblowing channel are received and followed up, or distributed as appropriate, by the Legal department.

All above-mentioned policies are available at: <https://www.hurtigruten.com/group/sustainability/reports/esg/>

3. Due diligence

3.1. Mapping of supply chain and business partners

Details from all invoices received by Hurtigruten Group over the last four years have been imported to our procurement analytics tool. In 2024, Hurtigruten Group received invoices from around 1,800 companies. These companies have been classified as either suppliers or business partners as per Section 3 d) and e) of the Transparency Act.

Suppliers: Any party in the chain of suppliers and sub-contractors that supplies or produces goods, services or other input factors included in an enterprise's delivery of services or production of goods from the raw material stage to a finished product.

Business partners: Any party that supplies goods or services directly to the enterprise, but that is not part of the supply chain.

These 1,800 companies provide goods and services to the entire group, with the majority linked to the ship operations in Hurtigruten. The categories Ship repair and maintenance, Fuel and energy, Marine operations and Crewing are directly linked to these two companies and represent 40% of the group's total spend.

Fuel and Energy was the category with the highest spend in 2024. This represents Hurtigruten purchase fuel from key suppliers in Norway and recognized partner with a global network of suppliers. *Marine operations* include all suppliers directly involved in the technical operation of our ships. For Hurtigruten these suppliers are mainly located in Norway.

3.2. Risk assessment methodology

As per Section 4 of the Transparency Act, due diligence shall be carried out regularly and in proportion to the size and nature of the enterprise, the context of its operations, and the severity and probability of adverse impacts on fundamental human rights and decent working conditions.

Our business partners provide goods and services that are not directly included in our core offering. These partners often involve highly educated personnel in low-risk industries such as digital, marketing, legal and

financial services, etc. All Hurtigruten Group companies have an obligation to ensure that our business partners comply with relevant laws and regulations, including those related to adverse impacts on fundamental human rights and decent working conditions. This is done via the expectations set in our Supplier Code of Conduct. Our business partners are selected and followed up in accordance with our Procurement Policy.

Our suppliers provide goods and services that go directly into our products. As part of our due diligence, we have screened our suppliers based on domicile country, industry, business relationship, spend in 2024 and influenceability.

Out of the 1,88 companies, 91 are classified as high risk based on either geography or industry. 60 of these are direct suppliers while 31 are business partners. We have made purchases for more than 10,000 EUR from 28 out of the 60 high risk suppliers. This group of 28 suppliers, responsible for around 1,5% of the Group's total spend, have been followed up with additional measures.

All of these suppliers have already gone through a risk-reducing selection process in accordance with our Procurement Policy at the time of contract signing. They are also expected to comply with the expectations set out in our Supplier Code of Conduct. Equally important, Hurtigruten annually, or ad-hoc as needed, request additional information from these key suppliers. The suppliers are then followed up based on the received (or not received) information.

3.3. Key findings

Our work to ensure human rights and decent working conditions is done both on a group level and on a company level. Some findings and mitigating actions may be applicable for only one company, while others are relevant for the entire group.

Our whistleblowing channel is established on Group level, hosted by an external provider and available for both internal and external stakeholders. Reports of harassment, both on land and onboard our ships, are amongst the cases reported in 2024. While some of these cases can be attributed to personnel conflicts, others are results of unacceptable acts by individuals. All reported cases are followed up by relevant parties such as HR and Legal with appropriate measures. The Group's position on diversity, equity and inclusion is thoroughly communicated in our policies, training courses and messages from top management.

In the last years Hurtigruten Group's fleet has undergone significant drydocking, refurbishments and conversion programs. Our main yard activities in 2024 were carried out in Norway, Denmark and Poland. These activities expose Hurtigruten Group to risks of adverse impacts on human rights and decent working conditions in the supply chain, including excessive working hours, hazardous working conditions and low wages. In 2024, 57 % of all employees in Hurtigruten were covered by a collective bargaining agreement. This includes all maritime crew.

We have an ambition to support local communities and source locally in the markets we operate in. In 2024, 80% of all food and beverage were procured from local suppliers. However, we also procure goods and services from suppliers in countries with elevated country risk ratings. Despite the risks associated with these geographical areas, we have not identified any actual adverse consequences to human rights.

4. Implemented and planned measures

The group implements risk mitigating measures to ensure human rights and decent working conditions both on the group level and on the company level. Some measures may be applicable for one company, while others are relevant for the entire group. These are further described in the sub-chapters below.

Our commitment to human rights is guided by international frameworks such as the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization (ILO) Core Conventions. Hurtigruten Group's Human Rights policy is approved by its Board of Directors and outlines our expectations both internally and towards our suppliers and business partners.

In 2023, we established separate Human Rights Committees in Hurtigruten. The mandate of these working groups is to monitor and oversee the human rights due diligence work done in the organization. The committees will review high-risk cases, prepare recommended mitigating actions, and bring this forward to the Executive Leadership Team for a final decision.

Hurtigruten Group can have a positive economic and social impact on local businesses, and we can use our purchasing power to improve environmental and social development. In 2024, we further matured the use of our procurement analytics tool to improve visibility of spend across different geographical areas and categories of goods and services.

Hurtigruten continues to monitor and evaluate the need based on feedback or if other findings emerge. Additional risk mitigating measures may include action plans, audits, internal audits, implementation of additional contractual clauses and sanctions for contractual breaches (including termination of contractual relationships). The need for, and the type of, action will depend on the situation.

To reduce supply chain risks in the yard industry, Hurtigruten mainly relies on familiar yards in Norway, Denmark and Poland. Audits are undertaken before entering new yards focusing on elements such as safety and working hours. We periodically review and update our audit procedures based on new experiences and findings. Lessons learned, meetings and other follow-up activities are arranged when needed after project completion. To increase the number of qualified yard suppliers, Hurtigruten currently conducts pre-qualifications, including technical and financial audits, and establish frame-agreements with relevant yards in the Nordics and Northern-Europe.

Contractual terms related to human rights and decent working conditions are incorporated into the yard contracts, including ensuring the right to access relevant information and documentation, and the right to conduct site visits and audits to review working conditions for workers at the yard. Contractual terms are also included as a measure to promote that workers receive a living wage for the work they conduct.

The procurement function plays a key role in our work to address risks to human rights and to ensure decent working conditions. An important part of this work is carried out through various procurement collaboration groups. Hurtigruten Norway has been a member of the procurement collaboration group GRESS since 2007. GRESS supports its members with access to resources, including topics related to the Transparency Act, climate change and animal welfare. Hurtigruten is a member of Incentra, a procurement collaboration group within marine operations which negotiates frame agreements and conducts pre-qualifications and audits. Every year, Incentra requests its members to participate in a supplier evaluation covering 10 evaluation criteria. The results are compiled into a report that is shared with the member companies. The supplier receives their individual report. The objectives for this evaluation are to ensure suppliers are measured and informed on their performance and progress, ability to focus on possible problem areas, active participation in the interaction with suppliers and agreements with approved, high-quality suppliers. Although the volume purchased through this organization in 2024 was fairly low, it's increasing, and our ambition is to even further increase this volume in the future.

5. References

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3. OECD Due Diligence Guidance For Responsible Business Conduct:
<https://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>
4. 2023 ITUC Global Rights Index:
<https://www.globalrightsindex.org/en/2023>

5. European Bank for Reconstruction and Development – Environmental and Social Risk Management Manual:
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