

Hurtigruten Group DEI Policy



Our mission is to build the undisputed global leader in sustainable inspirational adventure travel. To succeed, we believe in building a culture that are committed to embrace and encourage diversity, equity and inclusion. This is crucial to attract and develop top talents on the journey towards a greener travel industry.

We're committed to embrace and encourage Diversity, Equity, and Inclusion as a source of creativity, progress, and competitive differentiation.

We want to develop and maintain a culture that values difference, promotes empathy, mutual respect, and transparency and that does not tolerate any form of harassment or discrimination

We want to recruit, develop, promote, and manage our employees based on their talent, their ability to do the job, and the behaviours that they demonstrate in line with our core values.

We want everyone to be able to bring their whole self to work!

Our statement of purpose

Hurtigruten Group takes pride in ensuring a fair and equitable workplace for all our people. We aim to build an organization both at sea and land which is truly representative of the people, guests and communities we serve, ensure all our people feel a sense of belonging and purpose during their employment at Hurtigruten Group.

The purpose of this policy is to:

- 1) Ensure empathy, respect and inclusion are held up as core behaviours of Hurtigruten Group both by our people and our organization.
- 2) Ensure that no discrimination is tolerated in Hurtigruten Group.
- 3) Oppose and provide guidance for employees on what to do in case of discrimination.



Our Policy statement

All employees of Hurtigruten Group have the responsibility to treat others with dignity, empathy, and respect.

It is the Company's policy to prohibit discrimination and harassment against any applicant or employee based on race, colour, religion (including religious dress and grooming), sex or gender, national origin, ancestry, age, mental or physical disability, medical condition, pregnancy, military or veteran status, genetic information, citizenship status, marital status, sexual orientation, gender identity and/or gender expression, socio-economic background or any other reason prohibited by law.

All employees are expected to show conduct that reflects inclusion, diversity, and equity. This applies to any occasion where they are representing Hurtigruten Group – whether this be during work, work functions, events - on or off the work site or at another company's sponsored event.

Hurtigruten Group will not tolerate language, gestures or imagery that degrades and/or objectifies anyone and/or that serves to reinforce outdated gender roles. Hurtigruten Group does not tolerate any form of discrimination or harassment of our employees, whether this takes place during interactions with clients, suppliers, guests or other contacts in connection with work.

All employees are required to comply with the DEI Policy when dealing with other employees (including temporary or agency staff and consultants), job applicants, clients, suppliers, guests and/or contacts of the Company and anyone else with whom they come into contact during their employment.

DEI POLICY



Breaches to this policy

Employees who believe they have been subjected or been witness to any kind of discrimination that conflicts with the company's DEI policy and initiatives are encouraged to seek assistance from a leader or an HR representative in the People and organisation function and/or our channels for reporting grievance and compliance concerns.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Staff who make such allegations in good faith will not be victimized or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure. Any employee found to have exhibited any inappropriate conduct or behaviour against others, including bias, discrimination or microaggressions of any kind, may be subject to disciplinary action

Such behaviour may constitute gross misconduct and, as such, may result in dismissal. We take a strict approach to serious breaches of this policy.



Our Commitment

This policy is supported by our Diversity, Equity and Inclusion Strategy, embedded in Hurtigruten Group's Employer Value Proposition purpose, and overarching business objectives. The key pillars of the DEI Strategy will serve to accelerate our progress on our vision to become the undisputed global leader in sustainable inspirational adventure travel and a catalyst for change towards a greener travel industry.

We commit to:

- 1) **Fostering a culture where difference is invited, respected, and embedded**
- 2) **Capturing the essence of Hurtigruten Group's heritage while integrating a global mindset**
- 3) **Enforcing an explicit zero tolerance approach to discrimination and harassment**
- 4) **Embracing the journey to equity and belonging by recognizing the challenges and opportunities that will come with it**

This mission is supported by five key pillars which define our strategy, each representing our commitments to our people, guests, and the communities we serve and operate in.



Hurtigruten Group DEI key pillars

Our policy is supported by our Diversity, Equity and Inclusion Strategy, embedded in Hurtigruten Group's Employer Value Proposition purpose, and overarching business objectives. The key pillars of the DEI Strategy will serve to accelerate our progress on our vision to become the undisputed global leader in sustainable inspirational adventure travel and a catalyst for change towards a greener travel industry

Embrace the journey to equity

- Foster a culture where difference is invited, respected and integrated
- Implement an explicit zero tolerance approach to discrimination & harassment
- Embrace the journey to equity with all it entails

Lead with empathy and accountability

- Chart the path we are navigating for and with our employees
- Move from managing talent to engaging talent
- Inspire accountability for DEI across the organization
- Empower leaders to cultivate a safe and inclusive environment
- Equip leaders with the skills and tools to set talent up for success

Cultivate future explorers

- Leverage insights and data to develop and manage talent equitably
- Unlock the benefits of a global workforce
- Develop people for their future
- Empower people through clear and transparent communications and access to information
- Retain and leverage experience

Respect heritage, stimulate adventure

- Embrace Hurtigruten Group as a Heritage brand with a global perspective
- Stimulate curiosity and adventure
- Inspire the next generation of leaders in adventure travel
- Pioneer a better tomorrow for our environment and our people

Inspire a sustainable future

- Live up to our mission to be an organization which acts ethically and responsibly in the communities we operate in and impact
- Offer perspective on and enhance the impacts of sustainability
- Inspire a sustainable mindset and respect for our environment (for talent and guests)

Talent acquisition

Hurtigruten Group commits to Inclusive Recruitment, which includes all practices to ensure that every stage of the recruitment process is fair and offers equal opportunities to all groups of people, including all activities that involve connecting with, interviewing, and hiring a diverse range of individuals.

Actions and commitments being taken to ensure equity and fairness in talent acquisition must be in alignment with our Recruitment guidelines



Terms and Conditions of Employment

Hurtigruten Group will offer terms and conditions of employment that are free from all forms of direct and indirect discrimination and apply equally regardless of race, colour, religion (including religious dress and grooming), sex or gender, national origin, ancestry, age, mental or physical disability, medical condition, pregnancy, military or veteran status, genetic information, citizenship status, marital status, sexual orientation, gender identity and/or gender expression, socio-economic, trade union membership or on the fact that an individual is a part-time worker or fixed term employee.

No requirements or conditions will be imposed, directly or indirectly, which will or might place any group of employees at an unfair or unlawful disadvantage. Grievance and disciplinary procedures will be operated without discrimination on the grounds race, colour, religion (including religious dress and grooming), sex or gender, national origin, ancestry, age, mental or physical disability, medical condition, pregnancy, military or veteran status, genetic information, citizenship status, marital status, sexual orientation, gender identity and/or gender expression, socio-economic, trade union membership or on the fact that an individual is a part-time worker or fixed term employee or any other unlawful grounds.



Development

Hurtigruten Group commits to invest in the development of all employees equitably and foster an environment where everyone is provided equitable opportunities according to their needs. The Company will ensure that opportunities for training, career development and promotion are made available to all employees. The main method of identifying training needs will be through the appraisal procedures and promotion decisions will be based on merit alone.

Management and leadership accountabilities and responsibility

Our Executive Management Team has overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law. Day-to-day operational responsibility, including regular review of this policy, has been delegated to the People and Organization team. All managers must set an appropriate standard of behaviour, lead by example, and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice. The Head of People has overall responsibility for equal opportunities training.



Your commitments & responsibilities

We expect all employees in Hurtigruten Group to take personal responsibility for the application of and adherence to this policy, including fostering an inclusive environment for all those they work with. We also expect our people to be champions of the Policy and to follow the procedures and guidance laid out in this document should they feel they or someone else has been a victim of discrimination or harassment.

All employees are expected to contribute to the Strategy and help Hurtigruten Group to achieve its ambitions on the way to equity and belonging.

All employees are required to attend and complete diversity awareness training to enhance their knowledge to fulfil this responsibility



Monitoring progress

Our People and organization team will oversee the implementation of our diversity and inclusion action plan and report on progress quarterly to the Executive Management team and yearly to the Hurtigruten Group.

To ensure that this policy is operating effectively, and to identify groups that may be under-represented or disadvantaged within the Company, we may monitor employees and applicants' ethnic group, caring commitments, gender, disability, sexual orientation, gender identity or expression, socio-economic status, religion, and age. Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment, or any decision related to their employment. Analysing this data helps the Company to take appropriate steps to avoid discrimination and improve equality and diversity.

These reports will be incorporated into annual reports (ESG) on progress made against our strategic objectives and will be published on our website and form part of a commitment to workforce diversity information.

The due diligence system is based on the Guiding Principles for Business and Human Rights of the United Nations Organization (UN)



Implementation of our commitment to policies and processes

Identification and prioritization of issues

Regular impact assessment

Monitoring and reporting of progress and challenges

Dialogue with our stakeholders

Strengthening of internal capabilities

Establishing complaint mechanisms

Questions

If you have any questions regarding this Diversity, Equity, and Inclusion Policy please contact your direct manager, next-level leader, or a member of the People and Organization team.

Definitions

- Diversity: Inviting and respecting difference, both visible and non-visible, into Hurtigruten Group
- Equity: Through behaviour, education and awareness foster an environment where everyone is treated according to their needs and is equipped to do so for others
- Inclusion: Enhancing Hurtigruten Group's culture and business through widening participation, respect and leveraging every individual's diversity to contribute to the whole
- Bias: Prejudice, either explicit or implicit, in the treatment or perception of others. Bias can be acted on consciously or be something one is unaware of in how they judge or treat others.
- Discrimination and harassment: Unfair and / or unequal treatment of different kinds of people based on visible and / or non-visible characteristics such as race, ethnicity, gender identity, sexual orientation, age
- Microaggressions: An action or statement which constitutes either direct or indirect discrimination, often unintentionally



