

## HURTIGRUTEN GROUP POLICY ON PUBLIC POLICY AND POLITICAL INVOLVEMENT

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Owner: CEO Hurtigruten Group	

Hurtigruten Group supports the democratic process in all regions where we operate, and encourage employees to be active in civic and community activities. All political activities by the company and its employees must comply with our code of conduct and local regulations.

### **Lobbying**

We engage in discussions with local and national governments on public policy issues, when we determine it is in the best interest of our company and our stakeholders. We work with governments by entering into dialogue and provide a factual perspective that supports our view, as well as share relevant information. We usually do this ourselves or through NGOs, trade groups and industry organizations such as AECO and IAATO. Sometimes we are also supported by external specialists and consultants in these matters, but as a general principle these will identify themselves as working on our behalf.

### **Political contributions and corporate payments.**

We do not use corporate funds to contribute to candidates, political party committees and political action committees to promote the election or defeat of candidates for office.

We may use corporate funds, if deemed necessary, to build support for or against individual initiatives that affect our business. These funds can not be donated to any political party, and the support for or against any such initiative will be clearly identified as supported by Hurtigruten Group.

### **Employee political and civic activity**

The company's employees have the right to participate in the political process by making personal contributions from personal funds, subject to applicable legal limits and requirements. Such contributions is to be seen as from the employee as a private individual, and Hurtigruten Group is in no way a participant in these donations. Employees will not be reimbursed by the company directly or otherwise through compensation increases for personal contributions or expenses.

Employees may voluntarily participate in campaign activities but must do so on their own time, or by taking paid time off or an unpaid leave of absence.

### **Compliance, transparency and oversight**

Any donations or other type of use of corporate funds, that has been designated to directly support a political initiative, will be published in our annual report. EVP Communications and Public Affairs and Business Unit CEOs have oversight over any political involvement and relevant spend. EVP Communications and Public Affairs will report any relevant such spend to The Executive Management Team and the Board of Directors.