

**HURTIGRUTEN GROUP HUMAN RIGHTS POLICY & DUE DILIGENCE FRAMEWORK**

Version: 1.0	Place and date: Oslo, April 12th 2024
Owner: CEO Hurtigruten Group	

**Objective / Introduction**

In Hurtigruten Group, we are dedicated to ensuring that every journey we undertake not only offers experiences of a lifetime to our guests but also meets our high standards for human rights and decent working conditions. We understand and promote our responsibility to uphold human rights in all facets of our operations, whether at sea or on land.

This Human Rights Policy and our human rights due diligence framework are fundamental to our mission of fostering a culture of respect, equality, and fairness. With this policy, we aim to:

- 1. Protect Human Dignity:** We are committed to ensuring that the inherent dignity of every individual, be it our employees, suppliers or business partners is respected and upheld throughout our operations.
- 2. Ensure Ethical Practices:** We hold ourselves to high ethical standards, both internally and in our interaction with external parties. We are dedicated to conducting business in a manner that is transparent, accountable, and free from exploitation.
- 3. Promote Inclusivity:** We strive to create an inclusive environment where diversity is celebrated, and everyone has equal opportunities to thrive. We are committed to promoting diversity, equity, and inclusion (DEI) within our workforce and beyond.
- 4. Support Local Communities:** We recognize the importance of engaging with and supporting the communities in which we operate. We are committed to being responsible corporate citizens and contributing positively to the social and economic development of local communities.

**Governance**

The board of directors holds the ultimate responsibility for overseeing Hurtigruten’s Human Rights governance. This oversight is facilitated by our Group CEO and supported by the company CEOs and their Executive Leadership Teams (ELT). The Chief Financial Officer (CFO) is tasked with process responsibility and serves as the sponsor of our Human Rights Committees, comprising key stakeholders such as the company’s heads of Risk, Procurement, Legal, and Environmental, Social, and Governance (ESG) departments.

**Human Rights Commitment**

At Hurtigruten, our commitment to human rights extends across all aspects of our business:

- **Employees:** We are committed to providing a safe, inclusive, and respectful workplace where all employees are treated with dignity and fairness. We uphold the principles of non-discrimination, equal opportunity, and freedom from harassment and retaliation.
- **Suppliers and Contractors:** We expect our suppliers and contractors to share our commitment to human rights and adhere to ethical standards in their operations. We work closely with our partners to ensure that human rights considerations are integrated into our supply chain management practices.

- **Local Communities:** We strive to be a responsible corporate citizen and a positive force for change in the communities where we operate. We engage with local stakeholders to understand their needs and concerns and actively seek opportunities to support community development initiatives.

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.

### **Framework for Human Rights and Decent Working Conditions Due Diligence**

Hurtigruten Group is committed to maintaining a comprehensive framework for due diligence of Human Rights and Decent Working Conditions. This framework guides our efforts to identify, prevent, mitigate and remediate human rights risks and actual impacts associated with our operations and in our value chain.

Our Approach to Ensuring Human Rights in Our Value Chain

1. **Risk Assessment:** We conduct comprehensive human rights risk assessments across our entire value chain, including direct operations and business partners. These assessments consider factors such as geographic location and industry-specific risks.
2. **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.
3. **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.
4. **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.
5. **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 human rights practices.

**Reporting:** We annually report on our progress and findings in our Account of Due Diligence. This report is approved by our Board of Directors and is published on our website.

### **Alignment with the Norwegian Transparency Act**

Hurtigruten Group is committed to fulfilling its obligations under the Norwegian Transparency Act, which requires large companies to disclose information about their efforts to prevent violation of human rights and decent working conditions in their operations and supply chains. We are dedicated to transparency and accountability in our human rights due diligence processes, and we report on our progress and performance in accordance with regulatory requirements.

## Reference Documents

1. Code of Conduct

2. Supplier Code of Conduct
3. Working Hours Policy
4. Modern Slavery act Statement (relevant for HX)
5. DEI Policy
6. Annual Account of Due diligence

#### Revision History