Hurtigruten Supplier Code of Conduct

Introduction

At Hurtigruten, we promote fair, safe, and healthy working conditions and environmental responsibility throughout our supply chains. We cooperate closely with our suppliers and business partners in pursuit of these aims. Accordingly, we have prepared this code of conduct to illustrate what we expect of our suppliers and business partners. The code of conduct covers human rights, workers' rights, the environment and anti-corruption.

Hurtigruten seeks suppliers and business partners that are committed to continuous improvement in their labor, health, safety, and environmental practices. Hurtigruten works together with its suppliers and business partners to become leading in these practices, and to help our suppliers and business partners understand how to achieve these aims. We recognize that this effort requires understanding our suppliers' and business partners' and their employees' needs, and requires a collaborative approach using capacity building tools to drive this evolution.

Hurtigruten's' mission is "explore to protect", and to leave a footprint we are proud of. Hurtigruten seeks to exercise the best possible practices for the respectful and ethical treatment of workers and to promote sustainability across workplaces. For more information on Hurtigruten's corporate social responsibility, please visit hurtigruten.com/csr.

Principles

Hurtigruten's suppliers are to supply goods and services that are produced in compliance with the code of conduct. Moreover, the suppliers are to communicate the code of conduct to their contractors, subsuppliers, and to monitor implementation.

A supplier must be able to document compliance with the code of conduct at Hurtigruten's request. Such documentation may take the form of self-declaration, follow-up meetings, and/or inspections of the working conditions at production sites. The supplier will be obliged to name and provide contact information for any sub-supplier that Hurtigruten wishes to inspect.

In the event of a breach of the code of conduct, Hurtigruten and the supplier will jointly prepare a plan for remedying the breach. Remediation must take place within a reasonable time period. The contract may be terminated if the supplier remains unwilling to implement the plan to remedy the breach within a reasonable timeline. Upon material breach of the code of conduct Hurtigruten may terminate the contracts with the supplier effective immediately.

Requirement relating to own practise

When new suppliers are selected, emphasis will be given those who prioritize social welfare and environmental sustainability standards in their operations.

Neither Hurtigruten nor any of its employees shall ever offer or accept illegal or unlawful monetary gifts or other forms of remuneration in order to secure business-related or private benefit, or benefit for customers, agents or suppliers.

Hurtigruten and Hurtigruten's suppliers shall avoid contracting with or entering into business relationships with partners that operate in countries subject to international boycott by the United Nations and/or Norwegian Authorities.

Requirements of Supply Chain Conditions

Hurtigruten's Code of Conduct is founded on key UN and International Labour Organization conventions and documents. National, county, provincial, state, and city laws shall be respected. Suppliers who enter into agreements with Hurtigruten are obligated to follow and adhere to the following regulations:

1. Forced and compulsory labour (ILO Conventions Nos. 29, 105, 182)

- 1.1 There shall be no forced labour, including indentured, bonded, slave or involuntary prison labour.
- 1.2 Acts of human trafficking are also prohibited. Suppliers are required to monitor third party entities which assists them in recruiting or hiring employees, to ensure that people seeking employment with them are not compelled to work through force.
- 1.3 Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.

2. Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135 and 154)

- 2.1 Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, obstruct, the formation of unions or collective bargaining.
- 2.2 Workers representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.
- 2.3 All suppliers must develop and fully implement effective grievance mechanisms which resolve internal disputes, employee complaints, and ensure effective, respectful and transparent communication between employees, their representatives and management.
- 2.4 Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

3. Child Labour (UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146)

- 3.1 The minimum age for workers shall not be less than 15 and comply with
 - i) the national minimum age for employment, or;
 - ii) the age of completion of compulsory education,

whichever of these is higher.

- 3.2 There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.
- 3.3 No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety or morals, including night work.
- 3.4 Policies and procedures for remediation of child labour prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to supplier personnel and other interested parties.

4. Discrimination (ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women)

4.1 There shall be no discrimination in any aspect of the employment, including in recruitment, hiring, compensation, benefits, work assignments, access to training, promotion, discipline termination or retirement based on race, religious belief, color, gender, pregnancy, childbirth or related medical conditions, age, national origin, ancestry, sexual orientation, gender identification, physical or mental

disability, medical condition, illness, genetic characteristics, family care, marital status, status as a veteran or qualified disabled veteran (in the USA only), caste, socio-economic situation, political opinion, union affiliation, ethnic group, illness or any other classification protected under applicable law.

- 4.2 Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behaviour, and from discrimination or termination of employment on unjustifiable grounds, e.g. marriage, pregnancy, parenthood or HIV status.
- 4.3 All employment decisions must be made based on the principle of equal employment opportunity, and shall include effective mechanisms to protect migrant, temporary or seasonal workers against any form of discrimination

5. Harsh or Inhumane Treatment

5.1 Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

6. Health and Safety (ILO Convention No. 155 and ILO Recommendation No. 164)

- 6.1 The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 6.2 The employer shall take a proactive approach to health and safety by implementing policies, systems and training designed to prevent accidents, injuries and protect worker health. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.
- 6.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 6.4 Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and potable water.

7. Wages (ILO Convention No. 131)

We seek and favor suppliers who progressively raise employee living standards through improved wage systems, benefits, welfare programs and other services, which exceed legal requirements and enhance quality of life. 7.1 Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, including any fringe benefits required by law and/or contract, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income.

- 7.2 All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.
- 7.3 Deductions from wages as a disciplinary measure shall not be permitted.

8. Working Hours (ILO Convention No. 1 and 14)

- 8.1 Working hours shall comply with national laws and benchmark industry standards, and not exceed prevailing international standards. Weekly working hours should not on a regular basis be more than 48 hours or the maximum allowed by the applicable local law, whichever is fewer.
- 8.2 Workers shall be provided with at least one period of 24 consecutive hours off for every 7 day period.
- 8.3 Overtime shall be limited, consensual and voluntary. Recommended maximum overtime is 12 hours per week, i.e. that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement.
- 8.4 Workers shall always receive overtime pay for all hours worked over and above the normal working hours (see 8.1 above), at a minimum in accordance with relevant legislation.

9. Regular Employment

- 9.1 Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short term contracting (such as contract labour, casual labour or day labour), sub-contractors or other labour relationships.
- 9.2 All workers are entitled to a contract of employment in a language they understand.
- 9.3 The duration and content of apprenticeship programmes shall be clearly defined.

10. Marginalized Populations

10.1 Production, processes, operations and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming or degrading large land areas, use or degradation of water or other natural resources on which these populations are dependent.

11. Environment

- 11.1 Suppliers and partners shall maintain written environmental policies and standards and must comply with or exceed all applicable environmental laws, and agree to be monitored separately for environmental responsibility.
- 11.2 Suppliers shall continuously monitor, and disclose to Hurtigruten, their energy and natural resource usage, emissions, discharges, carbon footprint, and disposal of wastes and take a progressive approach to minimize negative impacts on the environment. Measures to minimize adverse impacts on human health and the environment shall be taken throughout the value chain. This includes minimizing chemicals, pollutants, and hazardous substances, establishing and promoting efficient and sustainable use of resources, including circularity and recycling, natural resources, energy, and water, and minimizing greenhouse gas emissions in production and transport. Waste and impacts from waste must be minimized.
- 11. 3 The local environment at the production site or any sites utilized shall not be exploited or degraded. If any such exploitation or degradation does occur, the supplier will cease the harmful activities and take all necessary steps to remedy the violation.
- 11.4 National and international environmental legislation and regulations shall be followed and relevant discharge permits obtained.

12. Corruption and money laundering

- 12.1 Corruption in any form is unacceptable and will not be tolerated, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.
- 12.2 Suppliers shall not be involved in money laundering. Money laundering is defined as an activity or arrangement implemented to make money acquired through criminal activity to look as though it has been lawfully earned.

13. Management systems of suppliers

The management system is key to the implementation of the code of conduct. Hurtigruten emphasises the importance of suppliers having systems that support such implementation.

14. Animal welfare

Suppliers must respect animal welfare and work progressively towards adopting healthy and humane practices towards animals based on best available technology and standards. Hurtigruten's Animal welfare standards are based on the Five Animal Freedoms, as defined by the World Organization for Animal Health.

- 1. Freedom from hunger and thirst: by ready access to fresh water and a diet to maintain full health and vigor.
- 2. Freedom from discomfort: by providing an appropriate environment including freedom of movement; sufficient open or free space, shelter and a comfortable resting area.

- 3. Freedom from cruelty, pain, injury, parasitic infection or disease: by prevention or rapid diagnosis and treatment.
- 4. Freedom to express normal behavior: by providing sufficient space, proper facilities and the company of its own kind.
- 5. Freedom from fear and (chronic) distress: by ensuring conditions and care that avoid mental suffering.

References

UN Supplier Code of Conduct:

 $\underline{https://www.un.org/Depts/ptd/sites/www.un.org.Depts.ptd/files/files/files/attachment/page/pdf/unscc/con} \underline{duct_english.pdf}$

The Ten Principles of the UN Global Compact:

https://www.unglobalcompact.org/what-is-gc/mission/principles

Five Animal Freedoms, as defined by the World Organization for Animal Health: http://oie.int