

# HUMAN RIGHTS POLICY

## Introduction

At DFDS, we recognise the importance of human rights and are committed to conducting our business in compliance with the United Nations Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development guidelines on responsible business conduct.

## Purpose

The purpose of this policy is to establish a framework to ensure that human rights considerations are prioritised within DFDS.

## Policy scope

Our commitment to human rights extends across all DFDS's own operations, and our global value chain. We hold firm expectations for our employees, suppliers, and third-party business partners to uphold the values and commitments outlined in this policy.

We are dedicated to respecting and upholding the fundamental principles of human rights, including:

- The right to life, liberty, and security of the person.
- Freedom from discrimination based on race, gender, religion, sexual orientation, disability, and other protected characteristics.
- Freedom from forced labour, child labour, and inhumane treatment.
- The right to fair and just working conditions, including fair wages, reasonable working hours, and the right to collective bargaining.
- The right to privacy and personal data protection.

These principles form the foundation of our human rights approach, and we are committed to upholding them throughout our operations, including through our Statement on Modern Slavery. At DFDS, we place a strong emphasis on active engagement with our stakeholders, fostering open and constructive dialogue to understand their perspectives and concerns regarding human rights. Our key stakeholders encompass a diverse range, including customers, employees, investors, regulators, and civil society.

## Process

### Risk assessment and due diligence

In alignment with the OECD guidelines on responsible business conduct, we have established a human rights due diligence process, ensuring thorough assessments of our human rights impacts. This is done through engagement with our stakeholders alongside our reassessments of our double materiality. This process of continuous reassessments is integral to our commitment to responsible business conduct.

Once human rights impacts are identified, we take proactive measures to cease, prevent, or mitigate them. We engage in an ongoing tracking and review of our impact mitigation measures and we report on our impact assessment including methodology and process at least annually in connection with the annual report.

#### Grievance mechanism and remedy

DFDS has a whistleblower hotline, making it possible for all employees, suppliers, other third parties and external stakeholders to confidentially report any serious concerns, including misconduct, unethical behaviour, violations of the Code of Conduct, any underlying policies, or applicable laws, rules, or regulations.

DFDS has a procedure to assess and approve the provision of remedy for individuals or communities adversely affected by our business activities. In cases where remedy would go beyond the normal operating procedures, the Review Group will assist in making recommendations for the Executive Management Team to approve.

### Roles and responsibilities

Although our entire organisation shares the responsibility of respecting and protecting human rights, the coordination of human rights efforts at DFDS is entrusted to the Director of Sustainability. Complementing this, a dedicated Human Rights Review Group has been established, comprised of representatives from Ferry, Logistics, Procurement, People, Health & Safety, Legal, and CSRD Reporting. Expertise from additional functions in DFDS are included on an ad hoc basis based on impact findings.

On an annual basis, this policy undergoes a review round, followed by approval processes involving the Sustainability team, the Human Rights Review Group, the Executive Management Team, and the Board of Directors. Ultimately, the Board of Directors assumes the responsibility for overseeing the effective implementation of the policy, reflecting our commitment to continuous improvement in the area of human rights within DFDS and its value chain.