NORDSEE Human Rights Policy Statement

NORDSEE policy statement (guideline) on human rights

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1. Introduction

At NORDSEE, respecting and promoting human rights is fundamental to our values and our commitment to "doing the right thing", which means conducting our business with respect, integrity and in compliance with all applicable laws and regulations as well as our own policies and procedures.

Our Human Rights Policy Statement ("HRPS") is based on the international human rights principles contained in the Universal Declaration of Human Rights, the International Bill of Human Rights and the Core Labour Standard (1998) of the International Labour Organization (ILO).

This HRPS applies to <u>all</u> parts of NORDSEE and should be read in conjunction with all relevant NORDSEE policies, which can be found internally on the (intranet) or externally on (external websites). NORDSEE expects its business partners to comply with these principles and to establish similar policies in their own organisations.

This HRPS applies at Group level and supplements (i.e. does not replace) other policies on the same topic that may apply at local level. If this HRPS and the local guidelines define different standards on the same topic, the higher standard shall apply.

In jurisdictions where (local) laws or regulations prescribe stricter rules than those contained in these HRPS, the stricter rules shall take precedence.

NORDSEE reserves the right to change, modify or discontinue these HRPS at any time and for any reason (e.g. to ensure that these HRPS comply with changes in law, policy or best practice).

Defined terms are **printed in bold and capitalised** in this HRPS. For the definition of terms, see Appendix 1 to this document.

2. Diversity, discrimination and harassment

We value, honour and respect differences and diversity among our employees in terms of gender, age, origin, nationality, religion, etc. and provide a work environment that offers equal opportunities to our employees and is free from unlawful discrimination or harassment; a work environment in which every employee is treated with dignity and respect. No form of corporal punishment, abuse or harassment (whether psychological, physical, sexual or verbal) is permitted. Disciplinary measures always comply with local legislation and human rights.

3. Forced labour

We believe that labour should be performed on the basis of free will. Accordingly, we prohibit the use of all forms of forced labour, including modern slavery or human trafficking.



4. Child labour

All of our employees meet the applicable legal minimum employment age. We comply with all applicable child labour laws, including those relating to recruitment, wages, hours worked, overtime and working conditions.

5. Wages and working hours

We pay our employees fairly and in line with industry standards and comply with all applicable laws regarding wages, working hours, overtime and working conditions.

6. Health and safety

We offer our employees a safe and healthy working environment and comply with all applicable laws and regulations regarding working conditions.

7. Freedom of association

We respect the rights of our employees to join or refrain from joining a group (e.g. employee organisation, trade union) and comply with local laws regarding the right of employees to freely join and form employee organisations.

8. Reporting (notification of an offence) and investigation (of the allegation)

Any employee who suspects or is aware of a breach of this HRPS, NORDSEE's policies or the law should report this to local management, their HR department or via our whistleblowing procedure.

A report will only be forwarded to those persons who need to know about the report or are otherwise required to finalise an investigation or respond to a report. No employee will be disciplined for reporting an actual or suspected violation of the HRPS, NORDSEE's policies or the law in reliance on the validity of this HRPS. All reports will be taken seriously and dealt with promptly and appropriately. Further information can be found in our Whistleblowing Policy.

We need your help with internal investigations or enquiries. NORDSEE will conduct such investigations fairly and in accordance with applicable laws.



Appendix 1: Definitions of terms

HRPS: Human Rights Policy Statement (guideline) on the subject of human

rights.

NORDSEE or We NORDSEEGmbH, based in Herwigstraße 16, 27572 Bremerhaven,

registered under HRB 2941 Bremen and part of the QSRP Group;