

POLICY FOR HUMAN RIGHTS & DECENT WORK CONDITIONS



Policy for human rights and decent work conditions

Purpose

Acting responsibly is crucial for Austevoll Seafood ASA (AUSS), and integrated into our vision, values, business strategy and processes. One of our key areas of focus is to strengthen our communities. Protecting human rights and decent work conditions is directly tied to this focus area and is an integral part of how we exercise our business in all parts of the globe.

Internationally recognised standards and principles, provide the platform for our approach and initiatives. We are committed to respecting and supporting the human rights of all individuals potentially affected by our operations.

We support the International Bill of Human Rights, and the Core Conventions of International Labor Organization (ILO). AUSS further endorse the United Nations Guiding Principles on Business and Human Rights and the Transparency Act (Åpenhetsloven) based on the OECD Guidelines for Multinational Enterprises. AUSS is a member of the United Nations Global Compact.

AUSS as a holding company exercising active ownership in its Portfolio companies, shall contribute positively and constructively by influencing work on human rights, prevention of child labour and protection of labour rights, both within AUSS, its Portfolio companies, and in relation to suppliers, subcontractors and other business partners.

Scope

Protecting human rights and ensuring decent work conditions are an integral part of AUSS' Code of Conduct, which is obligatory for all employees and all who operate on AUSS's behalf as further described therein.

This policy applies to the Group, hereunder all employees, directors, officers, hired personnel, consultants and representatives and any person conducting work on behalf of or otherwise representing the Group.

AUSS expects its subsidiaries, suppliers and business partners to conduct themselves in line with this policy and the AUSS Code of Conduct, and to respect all internationally recognised human rights principles and fundamental employee rights as described above, as well as local legislations in their geographical area in their entire value chain.

Definitions

- The Group: AUSS and its subsidiaries.
- AUSS Personnel: All employees, directors, officers, hired

personnel, consultants, company representatives and any person conducting work on behalf of or otherwise representing the Group.

Relevant steering documents

This document is part of the AUSS's governance model.

Risk tolerance

AUSS has zero tolerance for violation of human rights and international recognized fundamental employee rights. In cases where suppliers or business partners are unwilling, or unable to comply with AUSS' Code of Conduct including this policy for human rights, the severity of the breach and the probability of remediation thereof shall be assessed and consequences for the business relationship concluded thereafter.

Roles and responsibilities

All those who work at AUSS or its subsidiaries are responsible for positively ensuring human rights and fundamental employee rights. The top management in each Portfolio company is responsible for ensuring compliance with this policy, and that the organisation has appointed personnel with competencies who are assigned the task of ensuring compliance.

Ownership and implementation

- The CFO at AUSS is the owner of this document and is responsible for updates.
- The policy has been developed by the corporate management at AUSS, presented to the ESG Committee and approved by the Board of Directors.
- The CEO of AUSS has overall responsibility for the policy.

Principles for human rights and decent work conditions

In addition to adhering to the principles for protection of human rights and decent work conditions as further described herein and the AUSS Code of Conduct, AUSS expect particular focus on the following topics within human rights by its subsidiaries and business associates;

- *Forced labour;* All forms of forced labour, slave labour or involuntary labour are strictly prohibited. Employees shall not be obliged to submit a monetary deposit or identity papers to the employer and shall be free to terminate their employment with a reasonable period of notice.
- Child and youth labour; Children under the age of 18 shall not perform work that represents a health or safety hazard, including night shifts. Children under the age of 15 shall, as a main rule, not be employed. In special

circumstances, such as local/traditional factors, exemptions can be made down to the age of 13. Apprentices complete those assignments and follow the working hours specified for the company at any given time. Guidelines outlined in our Code of Conduct for work performed by children shall be followed.

- Regular employment; Obligations in relation to the employees, in line with international conventions and/or national legislation to be complied with. All employees are entitled to an employment contract that clearly defines terms of duration and content in a language that is understandable for the employee in question.
- *Salary;* Salaries paid to employees shall as a minimum comply with the national provisions regarding minimum wage or the industry standard, and shall always be sufficient to cover basic needs. Disciplinary deductions from salary are not permitted.
- *Working hours;* Working hours shall comply with national legislation and shall be in accordance with prevailing international conventions.
- *Trade unions and collective bargaining;* Without exception, employees shall be entitled to join or establish trade unions according to their free will and to bargain collectively. The employer shall not discriminate against trade union representatives or prevent them from performing their duties for the trade union. Should this entitlement be limited by law, the employer shall facilitate for and not at any time prevent parallel mechanisms for free and independent organisation and bargaining.
- Discrimination and barassment; All forms of discrimination and harassment at work based on ethnicity, religion, age, language, disability, gender, marital status, sexual orientation, trade union membership or political beliefs are strictly prohibited. Measures shall be established to safeguard against sexual harassment, threatening, insulting or exploitative behaviour and to prevent discrimination or dismissal on unfair grounds. Sexual harassment creates an unacceptable and intimidating work situation and is not tolerated.
- *Physical cruelty;* Physical cruelty or punishment, or threats of physical cruelty, are strictly forbidden. The same applies to sexual or other abuse and different types of humiliation.

Human rights due diligence process

AUSS Personnel working with business associates such as suppliers, subcontractors, consultants, advisers, agents, partners or other business associates must inform these of the company's policy for Human Rights and Decent work conditions and ensure that they agree to comply with all relevant parts of the policy. In the event of nonconformances, action must be taken to ensure that such parties comply with the policy. If it becomes evident that such parties are unable to comply with AUSS's policy, all cooperation with them shall be terminated.

AUSS expects all business associates to comply with prevailing legislation, to respect internationally recognised human rights and to follow AUSS's own policy for Human Rights and Decent work conditions. If there are any discrepancies between any of the above, the main rule is that the most stringent requirements shall be followed.

Each subsidiary should implement a centralised system to handle public inquiries on our human rights efforts.

AUSS expect that its subsidiaries establish measures to achieve a responsible supply chain and establish a system to ensure systematic audits and follow-up of suppliers in regard to human rights and decent work conditions as further set out above.

Risk indicators

Reports from the companies are given on a regular basis that include human rights indicators. For all extraordinary or precarious situations immediate reporting is mandatory.



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