



Group Policy

Sustainable Operations

HUMAN RIGHTS

Document owner: CHRO
Approver: CEO

Valid from: 10 March 2021
Last updated: 07 July 2022

Human Rights

1 The purpose of this policy is

To set out Grieg Seafood's principles for human rights throughout our operations and our value chain.

2 Policy Statement

Respecting human rights is a fundamental part of Grieg Seafood Group's corporate responsibility and is vital to the sustainable operation of our business.

GSF Group is committed to respecting fundamental human rights in our operations, our value chain, and in the communities where we operate. We use our influence to promote the fulfilment of human rights and always seek to avoid involvement, even indirectly, in their abuse.

Grieg Seafood recognize that we can contribute to the fulfillment of human rights. We have a responsibility to prevent, mitigate, and address adverse human rights impacts in our own operations, but we also use our leverage to promote respect for human rights in our value chain.

Our commitment is based on our company values, our Employee Code of Conduct and our Supplier Code of Conduct.

3 Our principles

Our approach to human rights is based on the UN Guiding Principles on Business and Human Rights. We have a responsibility to protect, respect, support, and promote human rights in all our operating regions and throughout our value chain.

We are committed to respecting all internationally recognized human rights relevant to our operations and supply chains:

- The Universal Declaration of Human Rights, which states "All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood."
- The ILO Declaration on Fundamental Principles and Rights at Work, which defines principles and rights across four categories: freedom of association and the effective recognition of the right to collective bargaining; the elimination of forced or compulsory labor; the abolition of child labor; and the elimination of discrimination in respect of employment and occupation.
- The United Nations Convention on the Rights of the Child (UNCRC), which states that children are individuals with their own rights. Childhood is separate from adulthood, and lasts until the age of 18; it is a special, protected time, in which children must be allowed to grow, learn, play, develop, and flourish with dignity.
- The United Nations Convention on the Elimination of Discrimination against Women (CEDAW), which defines what constitutes discrimination against women and sets up an agenda for national action to end such discrimination.

- The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), which establishes a universal framework of minimum standards for the survival, dignity, and well-being of the indigenous peoples of the world. It elaborates on existing human rights standards and fundamental freedoms as they apply to the specific situation of indigenous peoples.
- International Covenant on Economic, Social and Cultural Rights, which establishes human beings' rights to economic, social and cultural development in their communities.
- The Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises. (OECD Guidelines), which set standards for responsible business conduct across a range of issues such as human rights, labor rights, and the environment.
- The United Nations Global Compact, which sets out ten principles in the areas of human rights, labor rights, the environment, and anti-corruption, to which we are signatories.

In our own operations

- Grieg Seafood welcomes and promotes unionization, collective bargaining, and other formal employee representation arenas according to the business culture of each of our operating countries. All our employees have the right to join or not join a labor union. All employees have access to third-party representation regardless of whether they are a union member or not.
- We conduct our activities without discrimination, we treat our employees fairly and compensate fairly by offering competitive salary and benefit packages. We use the Kornferry methodology to benchmark our salaries yearly and ensure that we are paying market rates as a minimum. We pay the same rates for same type of work regardless of gender, culture or other origin.
- We offer sick-pay to all our employees based on the national laws of the countries we operate in regardless of if they are permanent or temporary staff. We demand that our external hired staff and contractors have sick pay included in their contracts.
- All our employees are offered good and reasonable working hours, in accordance with union agreements to maintain a good worklife balance.
- Everyone who is employed by us works here of their own free will in alignment with the ILO Declaration.
- We have zero tolerance for bullying, unwanted sexual attention, or harassment.
- We promote diversity with respect to employee gender, age, ethnicity, physical abilities, personality, skills, experiences, and backgrounds.
- We respect employees' rights to privacy. The General Data Protection Regulation (GDPR) became Norwegian law in 2018. The GDPR provides assurances that personal information a company has a legitimate need to collect and use will not be used for other purposes. Basically, it concerns the weighing of interests. With the GDPR, the individuals' rights are highlighted, clarified, and prioritized
- We contribute to economic, social, and cultural development in the rural communities where we operate. Recognizing that our operations are based on natural capital, belonging to local communities as a whole, we strive to minimize our impact and create shared opportunities.
- We recognize the rights of indigenous peoples in our relevant production regions, as laid down in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), and we take particular care to avoid infringing such rights.

In our supply chain

- We have our own Supplier Code of Conduct which our suppliers are obligated to follow. Supplier must abide by the same rules as those we have laid down for our own employees.
- Our responsibility to respect human rights exists regardless of whether national governments fulfill their duty to protect human rights.
- In situations where national law and international human rights standards vary, we will follow the higher standard; if they are in conflict, we will adhere to national law, while searching for ways to respect international human rights to the highest degree possible.
- We work with all our stakeholders to ensure that human rights are respected in our supply chain, both upstream and downstream, based on our business relationships, influence, and operational situation.
- When necessary, we will use our influence to support the advancement of human rights in the societies and communities where we conduct our business, have an interest, or may make an impact.

4 Definitions

Grieg Seafood have obligations and duties under international law to respect, protect and fulfill human rights. Our obligation is founded on the economic, social, and cultural rights of an individual and include their social and cultural rights.

We define human rights as:

- All human is born free and equal in dignity and rights.
- Human rights are the basic rights and freedoms that belong to every person in the world, from birth until death.
- They are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status.
- The right to not be discriminated based on race, sex, religion, sexual orientation, age, or disability is illegal.
- They include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression and the right to work and education.
- They can never be taken away, although they can sometimes be restricted – for example if a person breaks the law, or in the interests of national security.
- These basic rights are based on shared values like dignity, fairness, equality, respect and independence.
- The right to a fair trial and to not to be punished for something that wasn't against the law at the time.
- The right to respect for family and private life.
- Fair employment of workers on a basis of equality without discrimination or segregation especially because of race, color, or belief.
- The right not to be discriminated against in respect of these rights.
- The right to protection of property.
- The right to education.

- The right to participate in free elections.

5 Tracking, reporting and key performance indicator

Our own operations:

- 100% completion of our Code of Conduct program, where employees are introduced to their rights and obligations.
- All reported harassment and whistleblowing cases are handled and closed in a professional manner with external expertise.
- All employees' salaries and benefits are evaluated and controlled on yearly basis to ensure fairness within same type of job families.

GRIEVANCE MECHANISMS			
Level	Accessible to	Mechanisms	Available where
Company-wide	All employees	External Whistle Blower Channel, handled by EY. Reversal of burden of proof, rules on disclosure.	On the intranet
Regional, business unit or department	All employees	Complaints, 'persons of trust', network. Line Manager, HR department, employee representative or Union representative	On regional levels and corporate level
Regional	Unionized employees	Labor Union's Third Party Complaint Procedure	Norway
Country	All employees	Regulatory Authorities and Courts: 1. Arbeidstilsynet in Norway 2. British Columbia Human Rights Tribunal 3. Conciliation and Arbitration Service (Acas). Acas Code of Practice on disciplinary and grievance procedures for UK and Shetland.	According to Governmental structures in each country
Regional	Stakeholders in our local communities	Grievance mechanism for local communities, in case of complaints related to our business: Complaints Resolution Policy for British Columbia.	The regional websites community.relations@griegseafood.com

Our supply chain:

A human rights due diligence is under development, covering both our own operations and our supply chain, in line with the Norwegian Transparency Act. It will be made public in 2023. Measures taken will also be communicated.

We will track and publicly report on our efforts to respect human rights in our value chain on an annual basis.

We acknowledge that our performance will change as we develop our practices, and we will constantly seek to improve our human rights efforts.

6 Responsibility for implementing and adhering to this policy

Board of Directors

- Monitors compliance with the policy, as this policy is an integrated part of our business strategy

CEO & Global Management Team

- CEO approves this policy
- Championing the policy
- Review of significant human rights issues, evaluating changes to our management approach

CHRO

- Defining our strategy and framework for managing human rights issues
- Reviewing and updating the policy
- Communicating policy organizationally
- Advising and assisting regional directors, managers and supervisors in addressing issues
- Responsible for results of the KPI and corrective actions

Head of Communications and Stakeholder Relations

- Responsible for execution of the human rights due diligence, including coordination of mitigating efforts
- Ensures adherence to the Norwegian Transparency Act

Regional Directors, Managers & Supervisors

- Communicating policy to all staff
- Adhering to policy
- Addressing issues
- Providing necessary training programs
- Responsible for results of the KPI and corrective actions in regions

All staff

- Adhering to policy
- Attending regular training/awareness programs
- Responsible for results of the KPI and corrective actions

7 Related documents or references

We aim to respect the human rights of all our employees as well as complying with all national laws. Our commitment to operate with respect for human rights is reflected in our Code of Conduct, and our company policies and procedures:

- Grieg Seafood Equal Opportunity Policy
- Grieg Seafood Workplace Harassment Policy
- Grieg Seafood Code of Conduct
- Grieg Seafood Supplier Code of Conduct

- Grieg Seafood Privacy Policy
- Grieg Seafood Discrimination Policy
- Norwegian Transparency Act