

Hampiðjan Group's Human Right Policy

1 Scope of Application

Hampiðjan Group's Human Rights Policy (hereafter: "Human Rights Policy") applies to all of us in Hampiðjan hf and its daughter companies (hereafter: Hampiðjan Group). In addition, Hampiðjan Group expects all suppliers and business partners to adhere to Hampiðjan Group's Supplier Code of Conduct.

This Human Right Policy should be read together with Hampiðjan Group's other policies, such as the Code of Conduct, the Supplier Code of Conduct, and the Whistleblower Policy.

2 Roles and Responsibilities

All **leaders and managers** within Hampiðjan Group are responsible for setting the right tone at the top to encourage compliance to this policy and to ensure that Hampiðjan Group complies with international human rights standards.

If any **employee** detects any breaches or potential breaches of the Human Rights Policy or the law, they have the responsibility to report it immediately to their manager or by following the process described in the Hampiðjan Group's Whistleblower Policy.

3 Human Rights Commitments

At Hampiðjan Group, we perform business in line with basic human rights enshrined in the UN Declaration of Human Rights. Hampiðjan Group shall comply with internationally recognised human rights that are enshrined, among other places, in the International Covenant on Economic, Social and Cultural Rights of 1966, the International Covenant on Civil and Political Rights of 1966 and the ILO's core conventions on fundamental principles and rights at work. And, in particular:

- The abolishment of all forms of forced or compulsory labour, child labour, and slavery.
- Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer cannot interfere with, or obstruct, the formation of unions or collective bargaining.
- There shall be no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on ethnic background, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, are strictly prohibited.
- The working environment shall be safe, hygienic, and secure.

4 Implementation

Hampiðjan Group will carry out a due diligence in accordance with OECD's guidelines, including a materiality analysis exercise in order to identify human rights risks amongst Hampiðjan Group's own business operations, including the activities of their supply chains and business partners. Hampiðjan Group will assess the prioritised risk areas based on several factors, such as the severity and scale of the risk, the extent to which Hampiðjan Group has directly or indirectly caused or contributed to the risk, the length of the relevant business partnership where the risk is found, and the possibility of using leverage towards the relevant supplier or business partner.

If Hampiðjan Group identifies adverse impact on human rights issues that Hampiðjan Group is causing or contributing to, Hampiðjan Group will cease the activities, and take action in order to prevent such activities to cause or contribute to adverse impact in the future. When necessary and possible, Hampiðjan Group will go into dialogue with stakeholders that are impacted by the activity and seek to implement corrective actions. Hampiðjan Group will also use its leverage towards suppliers and business partners in order to encourage them to implement measures to cease, prevent and mitigate potential and actual adverse impact in their supply chain.

Hampiðjan Group expects all employees to adhere to this policy. The Human Rights Policy will be communicated to all employees in Hampiðjan Group. Expectations concerning human rights towards suppliers and business partners can be found in *Hampiðjan Group's Supplier Code of Conduct*. To ensure that everyone in Hampiðjan Group is able and encouraged to report about breaches and potential breaches of our Human Rights Policy or other internal guidelines, Hampiðjan Group has developed a *Procedure for reporting (Whistleblowing) and handling of non-conformities*.