



Orkla Human and Labour Rights Policy

1.0 Introduction

At Orkla, we have a fundamental respect for the value of human life and dignity and want to foster a culture of respect and inclusion. We want to be a good place to work for our employees and strive to develop talent, teamwork, and diversity.

We will pay due attention to the rights and interests of employees, consumers, workers within our supply chain, local communities and other stakeholders affected by our business. We see respect for the rights and interests of others as necessary to be a trusted company and for achieving Orkla's long-term aspirations.

We respect universal human rights and will carry out our business with due diligence to avoid becoming involved in violations of human rights and address negative impacts. Orkla defines human rights as the human rights enshrined in the Universal Declaration of Human Rights¹ (1948), the two international covenants on civil and political rights (1966) and economic, social and cultural rights (1966) and the core conventions of the International Labour Organization (ILO)².

Human rights due diligence³ involves conducting risk assessments to identify and assess potential adverse (negative) human rights impacts associated with our operations, our supply chains and other business relationships, and to cease, prevent or mitigate such impact. The activities shall be monitored, and their effect evaluated. If we identify that we have caused or contributed to negative impacts, we will implement relevant actions to provide remediation, i.e., stop or reverse the adverse impacts. We commit to having effective channels for complaints (grievance mechanisms), that are accessible to all employees, and ask of our suppliers to do the same.

If we identify adverse impacts which are directly linked to our operations, products, or services through our suppliers or other business partners, we will actively influence the entity causing the adverse impact, to cease, prevent or mitigate the impact. We expect our suppliers and business partners to respect human and workers' rights and establish human rights policies which address the corporate responsibilities outlined in the UN Guiding Principles for Business and Human Rights. If we discover that suppliers or business partners are involved in violations of human rights, we will communicate our concerns and demand that the supplier or business partner take appropriate action, e.g., through a remediation process. If corrective actions are not taken and the violations endure, an assessment shall be made of whether to end the business relationship.

Through Orkla's Annual Report we will report on the activities conducted to identify and address actual or potential adverse impacts, including the findings and outcomes of those activities, and

¹ The Universal Declaration of Human Rights, <http://www.un.org/en/universal-declaration-human-rights/>

² Eight conventions are defined as fundamental by the UN's international worker organisation, the ILO. <http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

³ Orkla's understanding of human rights due diligence is based on the definitions and principles outlined in UN Guiding Principles on Business and Human Rights



make information about our due diligence policies and processes easily available for external stakeholders.

This document describes Orkla's guiding principles for handling the human and workers' rights which we see as having relevance for our daily operations. It applies to all Orkla subsidiaries and Group functions.

Our ethical requirements towards suppliers are described in Orkla's *Supplier Code of Conduct*.

2.0 Principles for addressing human rights in Orkla

All Orkla companies shall work in a systematic manner to respect human rights, in line with the principles described below.

2.1 Freedom of thought, opinion and expression

We value open, fact-based, honest and respectful communication within our own organisation as well as in our dialogue with external stakeholders. We will strive to achieve a working environment where employees feel comfortable in expressing their opinion without fear of retaliation. All our companies should take appropriate steps to make it easy for employees and external stakeholders to raise concerns and make sure that stakeholder concerns are handled in a respectful, fair and professional way.

We respect the freedom of religion, and we will strive to foster a working environment where all our employees feel included regardless of religious beliefs or cultural background. Our companies should be flexible when responding to concerns raised by employees related to religious customs as long as this is not in conflict with business needs or other human rights.

2.2 The right of life

We will do our utmost to protect the health and safety of employees, consumers, customers and others linked to our business. All our companies shall commit to the vision of zero harm to people, and work purposefully to create safe, healthy and attractive workplaces, in line with the requirements described in the *Orkla Environment, Health and Safety Standard*.

We will take care to prevent behaviour or working conditions that may negatively influence the mental and physical health of our employees and their families. Managers shall be aware of their responsibility for the safety and wellbeing of employees, and use the power of their position to foster a positive and healthy working environment. Orkla does not tolerate any form of coercion, punishment or harassing behaviour towards employees.

All our companies shall commit to ensuring safe products for consumers, in line with the requirements described in the *Orkla Food Safety Standard*.

2.3 The rights of liberty, security and privacy

In Orkla, we do not accept any form of forced labour, neither within our own operations nor within the operations of suppliers and other business partners. Employment in an Orkla company shall always be based on a voluntary agreement. Our companies shall not have internal procedures or carry out activities that prevent employees from leaving the company at their own wish.



We want to show due respect for the privacy of employees, customers and other individuals, and our companies shall adopt a restrictive practice towards monitoring or intrusion of employees' privacy. If a company sees the need to monitor certain operations, this shall only take place as permitted by legal requirements. Personal information about employees, customers or other business partners shall always be collected and handled in line with legal requirements and in compliance with the EU's General Data Protection Regulation (GDPR).

2.4 Competence development

In Orkla, we see employee development as important to achieve our business targets and be an attractive place to work. We want people to grow and flourish so they can deliver at their full potential. Moreover, we want our employees to feel that their efforts are valued and used in a meaningful way. We want to equip our people with the skills needed to be innovative and relevant in their jobs, and to address a potential future skill-gap. The Orkla companies should continue to invest in training, education and reskilling their workforce to grasp the opportunities of changing work patterns and workplaces due to new tools and technologies.

Our employees should receive as a minimum annual feedback on the quality and performance of their work, and have the opportunity to discuss relevant personal development activities. All companies shall establish formalised procedures for performance appraisals.

2.5 Diversity and no discrimination

We see diversity of perspectives as important to make good decisions, inspire creativity and in general, contribute to business improvement. Our companies shall work systematically to promote diversity in the workplace and prevent discrimination based on gender, religion, race, national or ethnic origin, cultural background, caste, social group, disability, sexual orientation, marital status, age or political opinion. The companies shall foster a culture where personal differences are respected and appreciated, and promote equal opportunity, particularly in relation to recruitment, compensation and benefits, promotions and training. The companies should also assess how operating processes and working tools can be adapted to physical differences among employees and make reasonable adjustments.

2.6 Consultation and employee involvement

We see good internal communication and cooperation between management and employees as crucial for the company's ability to succeed and for the well-being of employees. Our companies shall allow employees to be heard in decision processes that have relevance for themselves and the workplace, for example related to occupational health and safety and workforce reductions. Also, our employees shall have the opportunity to become informed about the strategy and progress of the company, for example through the use of intranet and regular hall meetings.

We respect the freedom of association and right to collective bargaining and want to foster a respectful and constructive dialogue between management and trade unions. Our companies shall establish channels for dialogue and collaboration between the management and representatives of the employees.

2.7 Fair working terms

We want to provide just and favourable working conditions for our employees. Our companies shall make sure that all their employees, including part time employees and temporary workers, have a written working contract. Working hours shall comply with national law and benchmark



industry standards, whichever affords greater protection, and with negotiated company agreements. The work should be organised in a way that allows employees to handle their assigned responsibilities within normal working hours and reasonable actions shall be taken to prevent an unhealthy workload. The use of overtime shall follow national legislation and be based on a framework agreement which has been negotiated with the company's employee representatives.

All Orkla companies shall have working terms which allow employees to combine working and family life, including due consideration of parental duties. Employees shall be provided with at least one day off for every seven-day period. All full-time employees shall, as a minimum, receive wages and benefits which are sufficient to afford a decent standard of living⁴ for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs, including provision for unexpected events.

2.8 Respect for children's rights

We recognise the vulnerability of children and will do our utmost to protect children from physical, mental or moral harm. We respect children's rights and will actively support these through our activities and business relations.

No Orkla company shall employ individuals who are below the normal age for completing compulsory school, or below 15 years of age, whichever is the highest. Young workers, defined as employees who are above the school-leaving age, but below the age of 18, shall not perform hazardous work, or work to an extent which negatively influences the ability to participate in education activities. If child labour is found within our own operations, we will immediately remove the child from all work, set up a remediation programme to protect the interests of the child and monitor the progress of the programme until the child has reached working age. Such cases shall always be reported to Orkla Group in line with Orkla's contingency procedures and relevant actions will be determined in a dialogue with business unit and business area.

All Orkla products must meet strict health and safety requirements. When developing products aimed at children, we will be extra cautious to make sure that we do not expose children to harm or undesired influence in any way. Marketing communications must comply with all relevant laws and regulations in the local country. Orkla supports the EU Pledge for responsible marketing of food and beverages and will not advertise products to children under the age of 12 if the products do not meet the common EU Pledge Nutrition Criteria. Where local or regionally agreed pledge criteria are stricter, these should be applied.

2.9 Protection of marginalised populations

All our companies shall make sure that their operations do not interfere with the right of self-determination of indigenous people, for example related to land areas or other natural resources upon which they are dependent. If an Orkla company has business plans which may have an impact on a marginalised population, the company shall establish a dialogue with representatives for the population group in order to find a solution which is satisfactory to both parties.

⁴ Based on the Anker Methodology for Estimating a Living Wage

2.10 Responsible purchasing practices

We consider responsible purchasing practices to be one of our most important tools for responsible business conduct. We shall adapt our purchasing practices to strengthen, and not undermine, our suppliers' ability to deliver on our requirements related to human rights. We strive towards relationships with suppliers who show a particular willingness and ability to create positive developments for workers in the supply chain.

2.11 Supplier development and partnership

In dialogue with suppliers we will consider, if needed, to contribute with capacity building or resources that enable our suppliers to comply with our requirements related to responsible business conduct. In this way we lay the foundation for collaboration with suppliers that show engagement in positive development for people and society within the supply chain.

3.0 Implementation and monitoring requirements

All our companies shall take necessary steps to comply with the principles described above. In particular, Orkla expects the companies to:

- Communicate the human rights policy to all managers and trade union representatives
- Carry out an annual assessment of the risk of being involved in unfavourable or harmful impacts on human rights and take reasonable steps to reduce identified risks. The assessment shall be based on Orkla's Group template for human rights risk assessment and the results of the assessment shall be reported to the responsible for HR at business area level who will report to Orkla Group HR and Group Sustainability.
- Orkla Group Procurement (OGP) is responsible for the sustainable sourcing strategy and principles. All Orkla companies should implement sourcing procedures in accordance with the above principles. The procedures should be adapted to the level of supply chain risk and the company's internal resources, but shall cover:
 - Supplier requirements in line with the Orkla Supplier Code of Conduct
 - Pre-screening and risk assessment based on OGP tools and procedures
 - Training of procurement personnel
- Integrate the principles of the human rights policy in relevant internal procedures
- Ensure information on Orkla's central whistleblowing service, established to report breaches, or potential breaches of Orkla's Code of Conduct, is available for anyone who has a work affiliation with Orkla. Orkla companies within the EU, with +250 employees as of 17th December 2021 or +50 employees as of 17th December 2023, shall have local whistleblowing schemes in addition to the central scheme.

4.0 Roles and responsibilities

The responsibility for implementing the human rights policy lies with the CEO of each business unit, assisted by the HR function and Orkla Group Procurement. The management team of each business area is responsible for ensuring that the business units within the business area comply with this policy.

Cases which may represent violations of human rights shall be reported immediately to the relevant line manager and CEO of the business unit, and the business unit must establish internal



procedures for such reporting. The CEO is responsible for reporting relevant cases to the Business Area CEO in line with Orkla's Contingency Plan and to relevant functions at Group level, such as Group HR and Group Sustainability.

Orkla Group HR will monitor compliance with the requirements through review of the annual human rights risk assessment performed by the business units and through internal sustainability reporting.

The Sustainability function at Orkla is responsible for updating the policy and for developing relevant support material in collaboration with Orkla Group HR and Orkla Group Procurement. These functions may also assist the companies in awareness training.

Orkla's Responsible Employer and Human Rights Policy does not give customers, suppliers, competitors, shareholders or other persons or entities any legal rights beyond those that follow from applicable legal rules.

5.0 Approval

This version of Orkla's Responsible Employer and Human Rights Policy was approved by the Orkla ASA Group Executive Board on 6 December 2021.