

Human Rights Policy

Purpose of document:	<i>Describe our commitment to respect and promote human and labor rights .</i>
Scope of document:	<i>This policy applies to all entities where Wallenius Wilhelmsen ASA holds a controlling interest, including all employees, whether permanent or temporary, including consultants, temporary staff, contractors, agency staff, and representatives when they act on behalf of the company directly or indirectly.</i>
Key word Search	<i>UN Universal Declaration of Human Rights, International Labour Standards, Norwegian Transparency Act, EU European Sustainability Reporting Standards, human and labor rights, modern slavery, Group People Policy</i>

Background & Objectives

Wallenius Wilhelmsen is a global shipping and logistics company with employees and operations around the world, and we recognise that our activities may influence and impact the human rights and labor rights of our stakeholders. We respect the internationally recognised UN Universal Declaration of Human Rights, the core conventions that underpin it and the International Labour Standards (ILO Declaration on Fundamental Principles and Rights at Work). We prohibit any form of modern slavery in our operations and supply chain. This includes, but is not limited to, human trafficking, forced labour, exploitative working conditions and practices, and child labour. We are also committed to respecting land, forest, and water rights of those impacted by our operations.

Where local laws differ from or conflict with international human rights standards, we will always endeavour to honour the principles of internationally recognised human rights without violating local laws and regulations.

Responsibilities

The policy document must clearly state who has what responsibility for performing tasks related to the policy area. The following roles should be addressed (as a minimum):

- The Chief People Officer is accountable for the human rights policy.
- The Chief Sustainability Officer is responsible for ensuring an effective human rights due diligence, including handling of relevant risks and impacts.
- The Corporate Sustainability Department has a governance and advisory responsibility to facilitate the implementation of necessary governance, processes, and procedures.
- All leaders shall act according to our governance framework and leadership expectations considering the commitments in this policy.
- All employees are responsible for understanding, promoting, and conducting their work following this policy.

What are our commitments

We are committed to understanding our impacts and taking actions to enhance our positive impacts and reduce any negative aspects of our activities. Respecting human rights across all our business activities helps to uphold our core values and achieve our vision of creating long-term, sustainable value for society. Our duty and commitment to respect human rights requires that Wallenius Wilhelmsen:

- Avoid causing or contributing to adverse human rights impacts through our own activities, and prevent or address such impacts when they occur; and
- Seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations and services or connected to our business relationships.
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How do we meet our commitments

This policy is implemented through our human rights due diligence process and procedures. The policy and related documents (Code of Conduct, Group People Policy, Employee Handbook, and Supplier Code of Conduct) are all guided by relevant regulatory framework including the Norwegian Transparency Act, the OECD Guidelines for Multinational Enterprises, and the United Nations Global Compact and Guiding Principles on Business and Human Rights. We assess our actual and potential human rights impacts, act upon the findings, monitor progress, track responses, and communicate how impacts are addressed. This is an ongoing process, and we will continuously improve our approach and report publicly on our performance. Wallenius Wilhelmsen takes a systematic approach, integrating human and labor rights considerations into key company activities and processes, e.g. in company risk

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management processes, and procurement and supply chain management. The human rights scenarios that are most relevant to our business include:

- Reducing our climate impact as it poses a serious risk to right to life, health, food, and adequate standard of living for individuals and communities.
- Ensuring safe, healthy and decent working conditions, including psychological safety.
- Providing a work environment that is free of discrimination, harassment, intimidation or coercion.
- Treating people working for us fairly and without discriminating against (indigenous and minority) any group or individual based on ethnicity, religion, gender, age, nationality, sexual orientation, disability, family or carer's responsibility or any status protected by law.
- Promoting living wages and benefits.
- Promoting work / life balance through reasonable working hours.
- Opposing all forms of modern slavery including human trafficking and forced labour as well as child labour in our value chain.
- Respecting employees' rights to form and/or join trade unions and collective bargaining.
- Upholding the right to privacy of those who entrust us with their personal information.

We require everyone working at Wallenius Wilhelmsen, or on our behalf, to comply with this policy. We also expect our suppliers to do so, and we actively seek to work with companies who share our values. We are committed to communicating this policy, and our Supplier Code of Conduct, to our suppliers and other stakeholders.

Stakeholders

Grievance mechanisms and remediation

Wallenius Wilhelmsen is committed to providing avenues for affected individuals to come forward with human rights grievances. The policy is publicly available on our webpage, and stakeholders may request information and raise concerns through dedicated channels. Details can be found at [Sustainability - A sustainable approach to business - Wallenius Wilhelmsen](#) and www.walleniuswilhelmsen.com/who-we-are/governance. If Wallenius Wilhelmsen, through its actions directly causes or contributes to harmful human rights impacts, the company will promote access to and/or provide fair remediation. This policy will be reviewed on a regular basis to ensure continued relevance and drive continuous improvement.

Document History

Version	Date	Author	Owner	Key changes	Approved by
1	Jan 2025	CSO	CSO	Policy has undergone review with updates.	CPO
1.1	March 2025	CSO	CSO	Updated to new Template	CPO