

## 1 INTRODUCTION

Seagems Group and its subsidiaries (hereafter “Seagems”) is committed to supporting and promoting internationally recognized human rights activities and initiatives. Respect for human rights is a core value of our business and we strongly believe that long-term business success can only be achieved if human rights are acknowledged and protected.

Seagems’ approach to human rights is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs), United Nations Universal Declaration of Human Rights, the International Labor Organization’s (ILO) core labor standards and the ILO’s Declaration on the Fundamental Principles and Rights at Work. Seagems also follows the Ethical Trading Initiative (ETI) Base Code, as well as the principles outlined in the United Nations Global Compact, of which we are a proud member.

## 2 PURPOSE

To showcase Seagems’ commitment of support and to promote the understanding of the fundamental principles embedded in our business operations and culture, ensuring that we do not engage in activities that directly or indirectly violate human rights. Seagems’ Human Rights Policy Statement demonstrates our commitment to supporting and promoting human rights that benefit all our stakeholders, including our customers, suppliers, employees, shareholders, and the communities in which we live and operate. Seagems will ensure compliance with these principles through regular due diligence of its own operations, as well as its suppliers.

## 3 SCOPE

This policy applies to all in Seagems, and it is our corporate responsibility to uphold these principles throughout our organization. We expect all our stakeholders, including employees, suppliers and vendors, business partners, shareholders, and investors, to be aligned in upholding human rights globally.

In relations to suppliers, these commitments are further detailed in the Ethical Trading Policy and the Supplier Code of Conduct.

## 4 OUR COMMITMENT

Our commitment is guided by the following principles:

### 4.1 Ethical Business Conduct

Seagems is committed to the highest standards of business ethics which govern the conduct of our business operations. We require all business on behalf of the company to be conducted with honesty, integrity and in full compliance with all applicable laws and regulations.

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#### 4.2 Employee Rights and Fair Labor Practices

We believe all our employees deserve to be treated with respect and integrity. Therefore, we promote a work environment of transparency and trust. We compensate our employees competitively and operate in compliance with applicable wage, work hours, overtime and benefits laws and international labor standards.

#### 4.3 Diversity and Inclusion

In Seagems, we believe diversity creates strength. We support and encourage diversity and inclusion within our business, as well as with the companies and organizations with which we do business, by maintaining workplaces that are free from discrimination and harassment on the basis of age, sex, disability, marital status, pregnancy and maternity, sexual orientation, religion or beliefs, gender identification or expression, race (including color, nationality, and ethnic or national origin), political opinion or any other status protected by applicable law. We are committed to providing and promoting equal opportunities for all employees, eliminating all discriminatory practices, and promoting a work environment that is free from harassment, violence, and intimidation.

#### 4.4 Freedom of Expression, Association and Collective Bargaining

We support the right of every employee to express their opinions and communicate them, without fear of reprisals, censorship, or sanctions. We respect the principles of freedom of association and collective bargaining. We are aligned with the International Labor Organization and its core convention; the Right to Organize and Collective Bargaining Convention, as well as being committed to the Ethical Trading Initiative's Base Code.

#### 4.5 Safe and Healthy Workplace

Seagems is fully committed to the health and safety of our employees and to the protection of our community and the environment. Everyone has the right to a water and sanitation service that is physically accessible within, or in the immediate vicinity of the workplace. Seagems will exercise reasonable care in providing each employee a workplace free of recognized hazards, including violent acts or threats of violent acts against employees or third parties within Company workplaces. Seagems will make reasonable efforts to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal policies.

#### 4.6 Forced Labor and Human Trafficking

We're committed to preventing and prohibiting forced labor of any kind, including all forms of modern-day slavery or human trafficking.

#### 4.7 Child Labor

We do not engage in or condone the unlawful employment or exploitation of children.

#### 4.8 Right to Participate in Cultural Life

We believe that everyone has the right freely to access, participate in and enjoy culture, cultural heritage, and cultural expressions.

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#### 4.9 Rights of Indigenous Peoples, Refugees and Migrants

Seagems respects the rights of indigenous peoples, refugees, and migrants, insofar as they are affected by our business activities.

### 5 RESERVATION OF RIGHTS

Seagems reserves the right to interpret, modify, terminate, or revise this policy in whole or in part, without notice.

### 6 REFERENCE

*SG-DMS 2.1 - Employee Code of Conduct*

*SG-DMS 2.3 - Ethical Policy Statement*

*SG-DMS 2.4 - Equal Opportunity Policy*

*SG-DMS 3.1 - Health & Safety Policy*

*SG-DMS 4.1 - Ethical Trading Policy*

*SG-DMS 4.2 - Supplier Code of Conduct*

*SG-DMS 4.2.2 - Supplier Code of Conduct Guidelines*

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