

NORDEN's Human Rights Policy

Commitment to Human Rights

Respect for human rights is closely aligned with NORDEN's values Reliability and Empathy. NORDEN's respect for human rights covers all 48 human rights stated in the International Bill of Human Rights as required by the UN Guiding Principles on Business and Human Rights (UNGPs).

NORDEN's commitment to human rights is approved and supported by NORDEN's Executive Management as the highest level of management in the company.

To ensure alignment with the UNGPs, NORDEN's Human Rights Policy is informed by NORDEN's internal human rights expertise and reviewed by external human rights specialists.

Management of Human Rights

The scope of NORDEN's human rights due diligence is aligned with the UNGPs requirement that all companies must identify their adverse impacts on all human rights on an ongoing basis.

Therefore, for each human right, NORDEN evaluates whether or not NORDEN is at risk of adversely impacting the right given the industry, the locality and the nature of NORDEN's business. For the rights at risk, NORDEN assesses whether there is an actual or potential adverse impact on these rights and if any of the identified impacts can be determined as salient human rights impacts.

If adverse human rights impacts are identified, NORDEN prioritises and takes appropriate actions to prevent or mitigate these. NORDEN also tracks effectiveness of the actions taken to continue improvement. If actual adverse impacts are identified, NORDEN is committed to providing or collaborating around their remediation.

Employees in NORDEN's Corporate Social Responsibility (CSR) Department are regularly trained in human rights to ensure the competence to safeguard that NORDEN's policies and processes comply with the requirements set forth in the UNGPs.

Following the above process, NORDEN has conducted its first human rights impact assessment in 2015, and will repeat this process every two years going forward.

Stakeholder expectations

Supporting NORDEN's vision to be a preferred employer, NORDEN highlights the company's human rights efforts towards current and future employees. NORDEN expects all the company's employees at sea and on shore to assist NORDEN in respecting all human rights. To enable this, employees receive awareness training and information on human rights on a regular basis.

NORDEN expects of all business relationships directly linked to NORDEN to respect human rights. This expectation is for instance communicated to the company's suppliers through NORDEN's Responsible Supply Chain Management process, emphasising NORDEN's position as a responsible company and business partner. Suppliers are expected to inform NORDEN, if they identify that they cause, contribute or are linked to severe human rights impacts.

NORDEN is in the process of establishing further procedures for human rights due diligence among other third party groups.

Communication and dialogue

NORDEN strives to embed the company's activities within human rights broadly in the organisation. All employees have access to NORDEN's Human Rights Impact Assessments, the Human Rights Policy and action plans via the intranet.

NORDEN reports on its efforts to respect human rights in the annual CSR Report and communicates openly on human rights impacts, elaborating on potential salient issues identified and actions taken to prevent these.

NORDEN's Human Rights Policy is publicly available on NORDEN's homepage.

Reporting concerns

NORDEN values transparency and open communication and all stakeholders are encouraged to raise concerns or questions related to human rights through CSR@ds-norden.com

NORDEN expects all employees to inform the CSR Department, if potential or actual adverse impacts on human rights are observed. Severe adverse impacts must be reported and can, alternatively, be reported anonymously by using NORDEN's whistle-blower system SafeLine at safeline@horten.dk

Review

This policy is subject to annual review by NORDEN's Executive Management to ensure effectiveness and compliance with NORDEN's commitment to the UNGPs.

Latest review: March 2016