

## HUMAN RIGHTS POLICY AND PROCEDURES

### Policy

- A. Hafnia has a zero-tolerance policy of any form of violations of Human Rights. We comply with all applicable human rights, labor, and modern slavery laws in all jurisdictions where we operate, including regulations relating to forced labor, human trafficking, seafarer protection, and supply chain due diligence. We strive to keep our workplace free of modern slavery practices and other violations of Human Rights as defined in the:
- Universal Declaration of Human Rights;
  - OECD Guidelines for Multinational Enterprises;
  - United Nations Guiding Principles (UNGPs) on Business and Human Rights;
  - Maritime Labor Convention (MLC 2006); and
  - ILO Declaration on Fundamental Principles and Rights at Work.
- B. Additional standards are listed for Hafnia's seafarers, due to the elevated risks associated with their work, and the higher potential for human rights violations to occur.
- C. This Policy applies to all employees, contractors, vendors, and stakeholders who work with Hafnia (collectively, **"The Stakeholders"**).
- D. This Policy affirms The Stakeholders right to freedom of association and collective bargaining.
- E. Hafnia is committed to meeting its responsibility under this Policy in respect of Human Rights and decent working conditions and also providing a workplace free from discrimination, harassment, or abuse of any kind. We do not discriminate based on race, colour, nationality, gender, age, religion, disability, marital status, sexual orientation, gender identity, political affiliation, or any other status protected by law. Our procedures are implemented via the Procedures and Protocols set out in its internal operational documentation.
- F. Hafnia maintains confidential and accessible reporting channels for all employees, seafarers, contractors, and other stakeholders to raise concerns about potential human rights violations. Individuals who report concerns in good faith are protected from retaliation. Further details on reporting procedures can be found in the Hafnia Whistleblowing Policy.
- G. Hafnia is committed to preventing and mitigating human rights risks within our operations and supply chain. We expect our suppliers, manning agencies, service providers, and business partners to uphold standards consistent with this Policy.

### Policy Purpose:



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This Policy states Hafnia's stance on Human Rights and documents the measures taken to adhere to the highest standards of Human Rights.

#### **Internal Statement:**

This Policy is based on the guidelines and documents referenced herein. Hafnia considers a Human Rights breach to occur when an action is taken that is contrary to any of the principles set out in the International Bill of Human Rights.

#### **Main Policy Objectives**

Utilizing Zero Harm and Best on Water vision to supplement and deliver its commitment to securing a safe working environment through:

- Hafnia's Code of Conduct, Suppliers Code of Conduct and Health and Safety Policy;
- Compliance with applicable policies and laws in force onshore and at sea;
- Grievance mechanism to report, and procedures to remedy, unacceptable behavior;
- Transparency and accountability throughout its' entire organization; and
- Continually reviewing and identifying those areas with higher risk of human rights violations and proactively implementing processes to mitigate that risk.

#### **Our Actions:**

- Proactively carry out due diligence to respect Human Rights within its own companies and throughout its supply chain;
- Assess compliance to Hafnia's Policy via annual questionnaires and random audits;
- Include a risk assessment on human rights throughout all Hafnia business processes;
- Continually review and improve our service delivery and counterpart compliance;
- Investigate reported or suspected human rights violations and take appropriate action and derive learnings to prevent recurrences; and
- Train and brief employees and suppliers on the requirements to ensure compliance with Hafnia's Human Rights Policy.



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