

## Human Rights Policy

Hellefoss Book Paper AS is committed to avoiding and addressing adverse impacts on the basic principles for social, environmental, and economic development that we cause, contribute, or are linked to via our business relationships, including, but not limited to, employees, customers, suppliers, collaborators, local communities, and potentially affected groups, and other relevant stakeholders.

We wish to create a balance between our financial goals, and our passion for the environment and workers' rights, in a way that allows continued profits, while at the same time ensuring our activities are a benefit to society, both locally and internationally. We, at Hellefoss Book Paper, are certain that growth and responsible business practices can coexist.

The policy is guided by the Fundamental Conventions of the International Labor Organization and the United Nations Guiding Principles on Business and Human Rights, as well as the International Bill of Human Rights. Hellefoss Book Paper is committed to adhering to all local and state laws covering human rights. Where Norwegian law and these international human rights standards differ, Hellefoss Book Paper must follow the higher standard; where they are in conflict, Hellefoss Book Paper must seek to respect internationally recognized human rights to the greatest extent possible.

The purpose of this Human Rights policy is to ensure that we at Hellefoss Book Paper demonstrate responsible business conduct. The Policy follows globally agreed minimum standards and ensures that we at Hellefoss Book Paper are committed to managing adverse impacts on:

### Human rights including labour rights

- a. Elimination of discrimination with respect to employment and occupation including, but not limited to, ethnicity-, race- and gender-based discrimination. Decisions regarding any employment decision for hiring, job assignment, bonus, allowance, compensation, and discipline, shall not be determined by characteristics of the individual concerned. These decisions and discipline shall be based solely on education, training, and demonstrated skills or abilities.
- b. Elimination of harassment and abuse. We define harassment and abuse as any form or threat of physical or psychological violence, including slaps, pushes, verbal violence, threats, demeaning or insulting language, and any kind of sexual harassment.
- c. Elimination of all forms of forced or compulsory labor, or activities that are known to lead to forced labor (e.g., human trafficking),

- d. The abolition of child labor and adequate protections for workers above the legal working age and below age 18,
- e. Prevention of excessive working hours: We adhere to Norwegian Labour Laws, and any overtime hours within allowable limits are paid at a premium as legally required or by contractual agreement, whichever is higher. Employees are to be paid correctly for all legally paid time off,
- f. Freedom of association and collective bargaining, and interference or retaliation for efforts to freely associate or bargain collectively is not tolerated,
- g. Safe and healthy work, including:
  - i. Access to water, sanitation, and hygiene (WASH),
  - ii. Emergency preparation and response,
  - iii. Hazardous materials handling procedures,
  - iv. Management systems that address health and safety risks, and
  - v. Appropriate building construction, electrical, and fire safety.
- h. Provision of the legal minimum wage and all legally mandated benefits including employer contributions for social security benefits and services,
- i. Aspirations for the provision of a living wage that covers the necessities for life as defined in its local context (e.g., food, water, housing, health care, education, clothing, transportation, childcare, discretionary income),
- j. Fair and ethical business practices, including anti-corruption/bribery.

This human Rights Policy is approved by:



17/2-25

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**Hellefoss Book Paper AS.**

CEO