

# Human Rights Policy - Nammo Group

## **PURPOSE and SCOPE**

We recognize that our business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts. For Nammo, human rights provide a framework through which we can ensure that we are behaving responsibly and respectfully to others, whether they are employees, contractors or external stakeholders across our operations and our value chain. The Human Rights Policy contains over-arching principles, which we embed into our procedures and systems.

This Policy applies to all employees of Nammo AS, and its subsidiaries under direct or indirect control and any third party acting on behalf of Nammo. (hereinafter "Nammo").

## **STATEMENT**

In line with the UN Guiding Principles on Business and Human Rights, we base our human rights policy commitment on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We follow the OECD Guidelines for Multinational Enterprises and are a signatory to the United Nations Global Compact.

## **POLICY**

We strive to prioritize the management of the human rights impacts of our business activities based on the operational context and our business relationships. We recognize that other human rights may become greater priorities over time and will regularly review our focus areas.

### *Our impact on others*

We shall ensure that our operational activities do not deprive others of their human rights. This requires us to exercise due diligence to understand and manage our impacts on human rights.

### *Diversity and inclusion*

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. We expect our workplaces to be free from discrimination and harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law.

The basis for recruitment, hiring, placement, development, training, compensation and advancement are qualifications, performance, skills and experience.

We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related activity outside the workplace.

#### *Grievance mechanism*

We have mechanisms in place through which employees may raise matters of concern and workplace related grievances, including anonymously if needed (SpeakUp and Ethicspoint).

Our external business partners or suppliers can report any irregularities about Nammo, in strict confidence, to [ethics@nammo.com](mailto:ethics@nammo.com).

#### *Freedom of Association and Collective Bargaining*

We respect our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialog with their freely chosen representatives. Nammo is committed to bargaining in good faith with such representatives.

#### *Forced Labor and Human Trafficking*

We prohibit the use of all forms of forced labor, including modern slavery and any form of human trafficking. This is reflected in Nammo's Modern Slavery Act Statement published annually on [www.nammo.com](http://www.nammo.com).

#### *Purchase of sexual services*

When at work or on assignment for Nammo, employees or third parties, shall refrain from purchasing sexual services. This is prohibited by law in several countries and contributes to human trafficking which is a violation of human rights.

#### *Child Labor*

Nammo does not tolerate child labor anywhere in our supply chain. We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required and we follow the ILO on child labor.

#### *Business Partners and Suppliers*

In our business dealings we expect our partners to adhere to business principles consistent with our own. We prohibit discrimination, forced, trafficked, and child labor and are committed to safe and healthy working conditions and the dignity of the individual, as well as the right to freedom of association and collective bargaining.

Nammo is regulated by national laws and regulations relevant to several aspects of our trade and import activities in every country where we operate. This includes regulations considering human right risks in the markets where we export and import. In addition to the regulatory control Nammo has implemented duty of care as part of the company's internal processes to further mitigate the human right risks on the customer side.

A supplier due diligence is part of the onboarding process of new suppliers. Every supplier is required to comply with the Supplier Conduct Principles in addition to Nammo's Code of Conduct to the extent not covered by their own standards. We specifically address the requirement for undertaking business in compliance with modern slavery, human trafficking and conflict minerals legislations. We promote responsible sourcing practices and hold business partners accountable to the standards we set forth in our Supplier Conduct Principles, Terms & Conditions and Code of Conduct.

#### *Training*

Awareness on prioritized human rights, as outlined above, is developed and integrated into our training plan and should be implemented in relevant training programs for our employees and third parties acting on our behalf. When implementing this policy, relevant training on human rights related issues and due diligence is provided for the relevant functions and stakeholders.

#### *Public Reporting*

Our performance, commitments and efforts are communicated and reported transparently in consistence with this Human Rights Policy, as part of our annual sustainability reporting.

### **OTHER RELEVANT DOCUMENTS**

- Code of Conduct
- Supplier Conduct Principles
- Modern Slavery Act Statement
- Health Environment Safety & Security Policy
- People Policy
- IT User Instruction



Morten Brandtzæg  
President & CEO