Human Rights and Modern Slavery Policy

DOCUMENT CONTROL	
Owner: Chief Executive Officer	Oversight: Board of Directors
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Approved by: Svein Erik Haugan, CEO	Approval date: 26 November 2026

1. Commitment

TEAM NORSO AS respects internationally recognised human rights, including principles of the Universal Declaration of Human Rights, ILO fundamental rights and UN Guiding Principles on Business and Human Rights. This policy covers employees, advisers, recruitment assignments and relevant business partners. Apply applicable Norwegian and other relevant laws; assess statutory reporting duties separately.

2. Prohibited conduct

Forced labour, human trafficking, unlawful child labour, coercion, threats, violence, discrimination, harassment and retaliation are prohibited. Workers shall be free to leave employment subject to lawful contractual terms, retain control of identity documents, receive lawful and agreed remuneration and exercise freedom of association. No hazardous work by persons under 18. Respect lawful working-time and rest requirements.

3. Responsible recruitment

Candidates must receive honest information about roles and conditions. Do not charge candidates recruitment fees for access to TEAM NORSO placements, retain identity documents, impose coercive debts or knowingly facilitate exploitative employment. Escalate credible concerns about client practices, unclear employment terms or intermediaries. Do not carry out unlawful discriminatory instructions. Assess candidates on job-related criteria. International recruitment occurs only occasionally and when required. Before accepting such assignments, assess intermediaries, applicable immigration and labour requirements and risks of exploitation; decline or withdraw from assignments where serious risks cannot be adequately addressed.

4. Risk-based due diligence

Assess relevant partners, intermediaries and assignments for human-rights risks, including cross-border recruitment, vulnerable workers, opaque subcontracting and unusual fees. Seek evidence proportionate to risk and require equivalent supplier standards under TN-POL-005. Record findings, prioritise serious risks, agree corrective measures and monitor outcomes. Where required, comply with applicable due diligence, disclosure and information request duties. Apply the risk-based due diligence principles of the Norwegian Transparency Act voluntarily, proportionate to the company and its impact, irrespective of whether its statutory thresholds apply. This does not replace any mandatory duties.

5. Reporting and remediation

Report concerns promptly under TN-POL-004 without retaliation. Prioritise safety and protection of affected persons, investigate fairly and cooperate with competent authorities as required. Suspend or discontinue arrangements where serious risks cannot be adequately addressed, considering adverse effects of withdrawal. Document actions and appropriate remediation.

6. Accountability

The CEO owns this policy, coordinates risk reviews and ensures awareness among relevant representatives; the Board oversees material risks. Review annually and after changes in activities, countries or suppliers. Relevant representatives shall read and acknowledge this policy in writing.

Basis: UN Guiding Principles, ILO fundamental principles; applicable Norwegian law including the Transparency Act where in scope; IMS.PO.40, pp. 3–4.