

## NEOT Human Rights Policy

### Commitment

We at North European Oil Trade (NEOT) respect the rights and dignity of all people. We expect NEOT employees, our partners and our suppliers to comply with all applicable laws and regulations as well as respect all internationally recognized human rights. Our respect towards human rights is embodied in our Human Rights Principles, Code of Conduct and Supplier Expectations.

NEOT's approach to human rights is based on the UN Guiding Principles on Business and Human Rights (UNGPR) which states the governments' duty to protect human rights and the businesses' responsibility to respect them. We respect the rights laid down in the International Bill of Human Rights as well as the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

In line with the UNGPR, NEOT is implementing human rights into its due diligence process. When evaluating the possible and actual human rights impacts of operations, consultations with the relevant stakeholders ranging from NEOT employees to workers in the field should take place. In the human rights impact assessment, emphasis is put on the dialogue with the stakeholders. We are committed to transparently reporting on how we address our legitimate human rights impacts.

NEOT ensures that all regulatory affairs with relevant actors, including governments, regulatory bodies and public authorities, are consistent with the human rights principles as stated in this document.

NEOT is committed to improving its internal awareness in the field of human rights through training and communications. The aim is to provide human rights training to the management and all other NEOT employees who may discover human rights violations in their work. Through familiarizing the employees with the situations in which violations are the most likely, the staff is better equipped to identify the risks and actual impacts.

### Human Rights Principles

NEOT Human Rights Principles foster awareness of human rights issues that are relevant to our work, further enhancing the capabilities to identify and manage the violations that may arise. The key human rights principles are outlined below. We seek to make contractual commitments with our employees and suppliers to encourage them to adhere to the principles.

#### **Fair wages and working hours**

To ensure fair employment, people involved in NEOT's own operations and supply chain must be provided with fair wages, at least in line with the national minimum. The employees have also right to just and favourable working hours, as stated in the national legislation.

### **Freedom of association and collective bargaining**

NEOT respects the right to freedom of association and collective bargaining and expects its suppliers and other partners to do so as well. Workers have a right to freedom of opinion and expression.

### **Discrimination**

Recognizing the universality of human rights, NEOT requires everyone involved in its own operations and supply chain to be treated equal. This means that diversity is respected, and no one should be discriminated in terms of their race, colour, religion, sex, national origin, ancestry, age, disability, medical condition, marital status, pregnancy, gender, gender expression, sexual orientation, or any other condition that could give lead to discrimination.

All workers have the right to be treated with dignity, and hence no form of harassment is tolerated.

### **Health and safety**

NEOT respects the right to health and safety at work and promotes better working conditions in its own operations as well as in supply chain. All applicable laws and regulations regarding safety must be complied, and the work should not cause any adverse impacts to the health of the worker.

At NEOT, customer protection is of utmost importance and we are committed to ensuring the safety and quality of our products.

### **Forced labour**

All workers involved in NEOT's supply chain have the right to be free from slavery, servitude and forced labour. This means that all forms of bonded and indebted labour, such as through having workers pay their recruitment fees, are against the NEOT Principles. It is also prohibited for the employers to withhold the workers' personal documents, such as passports, without the permission of the employee who must maintain the access and right to take back the documents at any time.

To ensure that the above rights are respected, NEOT prohibits illegible and illegal work contracts, and requires that all work documents must be written according to the applicable legal regulations. These contracts must be available to the employee. The workers must have the right to terminate their contract if so desired. They also have the right to leave their workplace after their shift has ended. All terms must be explained in a language and manner the worker understands.

### **Child labour and young workers**

NEOT respects the distinct rights of children and requires these rights to be realized throughout the supply chain. Using child labour under the minimum age of 15 (and in some special cases 14), as defined by the International Labour Organization, is prohibited. Children have the right to education, development and health, and the operations of NEOT shall not have adverse impacts on these rights. For instance, when a young worker under the age of 18 is hired, they should not be given tasks that involve hazardous labour. The work conditions for young workers must be adhering to all applicable laws and regulations as well as aim to be just and favourable.

### **Communities**

NEOT acknowledges how its own operations and the operation in its supply chain, besides having direct impacts on workers, can indirectly impact wider communities. These can, for example, include environmental, health and social impacts. All communities have the right to social and economic development, and the operations should by no means hinder this. People have the right to social security and the realization of economic, social and cultural rights. NEOT aims to not only reduce the risk of adverse impacts, but the operations can in fact assist the development of the communities. For instance, NEOT's operations can provide new economic opportunities. NEOT further aims to ensure all its employees and people working in its supply chain have adequate social rights, such as providing supporting services to the workers, which may encourage social progress also in the wider community.

All human rights impact assessments that NEOT conducts include finding out whether there are affected minorities. If this is the case, these communities should be involved in the impact assessment, and the realization of their human rights should be monitored with special attention.

### **Corruption**

NEOT promotes ethical business behaviour and forbids offering, promising, soliciting, accepting and giving bribes to advance actions in its own operations or in supply chain.

### **Privacy**

NEOT respects the right to privacy of everyone directly and indirectly involved in its operations, including the employees, business partners, workers in the supply chain and the customers. All personal data must be treated in a confidential manner.