

# FREYR Battery

## Human Rights Policy

Adopted on 19 December 2023

This Human Rights Policy (the "Policy") supplements and further develops the principles and objectives described in the *FREYR Battery Code of Conduct and Business Ethics*.

### 1. Objective

This policy sets out the principles for how we relate to our Employees, contractors, suppliers, and business partners, as well as people and communities affected by FREYR's business activities. We will strive to avoid infringing on the human rights of others and appropriately address adverse human rights impacts in activities which we are involved in. We will be particularly attentive where vulnerable groups are at risk of being adversely impacted by FREYR or by suppliers working for us or on our behalf.

This Policy and its implementation and embedding in our way of working will evolve, improve, and be adjusted over time based on our continuous learnings and experiences. Collaboration with our contractors, suppliers and partners is a prerequisite to achieve FREYR's human rights ambitions.

### 2. Scope

This Policy applies to FREYR Battery, Inc. and all its subsidiaries (collectively referred to as "FREYR Battery" or "we", "us" as appropriate), and all directors, officers, and employees, including temporary staff, consultants, and agency staff of FREYR Battery ("Employees").

We expect our contractors, suppliers, and partners to adhere to the same or similar standards of human rights as described in this Policy and will encourage them to cascade these principles to their sub-contractors and partners to the degree practicable and possible, when working with us.

This Policy sets out FREYR Battery's commitment to respect all internationally recognised human rights and labour rights ("human rights") including those set out in:

- *the UN Universal Declaration of Human Rights,*
- *International Covenant on Economic Social and Cultural Rights,*
- *the International Covenant on Civil and Political Rights, and*
- *the ILO's Declaration on Fundamental Principles and Rights at Work.*

FREYR Battery will embed respect for human rights in our way of working and be guided by the *United Nations "Protect, Respect and Remedy"* framework as described in *the United Nations Guiding Principles for Business and Human Rights*, *the Ten principles of the UN Global Compact*, and *the OECD Guidelines for Multinational Enterprises*, and applicable domestic law implementing human rights. We will learn from our experiences and continuously seek to mature and improve our human rights efforts.

### **3. Specific Provisions**

FREYR will in its operations particular focus, and engage with its supply chain partners, on the following topics:

#### **3.1. Child labour and forced labour**

All employment shall be voluntary. We will not allow the use of forced labour, including bonded labour, debt bondage, forced labour in penitentiary institutions, slavery, or human trafficking, and we will continue to work actively with our supply chain to prevent this.

We will not allow use of unlawful child labour. "Child labour" shall be understood in line with the ILO conventions No. 138 and 182.

#### **3.2. Inclusive and positive working environment**

We will create a fair, inclusive working environment where individuals with diverse characteristics, experiences and perspectives can develop to their full potential. We will not allow, and will actively work against, any type of unlawful discrimination at the workplace.

We will not allow and will actively work against physical, verbal, sexual or psychological harassment, abuse, or threats in the workplace.

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

We will respect the right of our Employees to freely associate, seek representation, and negotiate collectively with the company. In jurisdictions where such rights are restricted by law, we will establish appropriate channels to ensure the reasonable and independent exercise of such freedoms within applicable law.

#### **3.4. Decent working conditions**

We will uphold decent working conditions standards for our Employees. We will comply with the applicable laws on working conditions, including applicable minimum wages, regulated normal working hours, overtime, rest time, leaves and vacation.

#### **3.5. Promotion of occupational health and safety**

We will maintain safe and healthy working conditions which meet applicable legal standards. This includes ensuring a healthy and safe workplace, with appropriate protection from accidents, injuries, and work-caused illness, and providing workers' accommodations that are safe, clean, and adequate as living space. We will actively and continuously work towards the goal of zero accidents, injuries, and fatalities, and for general wellbeing in the workplace.

#### **3.6. Responsible use of security forces**

We will engage security forces based on the principles set out in the Voluntary Principles on Security and Human Rights. In particular we will support or take steps to ensure that security forces that are known to have been responsible for gross human rights abuses will not be hired.

### **4. Main Principles of Conduct**

In our business we shall be guided by the following principles:

4.1. All Employees shall respect the human rights recognised by domestic and international law when performing their duties for FREYR. When operating in countries where human rights law has not been sufficiently developed, we will follow our policies and international standards for human rights within the scope that local law allows.

4.2. We will promote a culture of respect for and awareness of human rights among our Employees. When operating in jurisdictions or with activities where the risk of violating human rights is high, the relevant officers and Employees shall be given particular attention and support.

4.3. We will develop and implement appropriate risk based due diligence procedures to identify, mitigate, evaluate, and report on human rights risk and adverse human rights impacts. We expect and will promote that our business partners, contractors, and suppliers respect and comply with human rights and establish similar due diligence systems in their value chains. In the promotion of and dialogue about these matters we will actively use the FREYR Battery Supplier Code of Conduct and other contractual mechanisms.

4.4. We have established a whistle-blower channel operated by an external service provider where third parties and employees can report, anonymously if so desired, amongst other things, human rights violations or concerns. Where appropriate we will also implement customized reporting and grievance mechanisms for human rights issues with protection guarantees and appropriate resolution procedures. We will clearly communicate the availability for third party and anonymous use of such mechanisms. We will work diligently to ensure that no individual suffers reprisals or retaliation for making good faith complaints or reporting or participating in investigations of incidents.

4.5. We will implement appropriate procedures and guidelines for our Employees to comply with the provisions of this Policy, including disciplinary procedures for breach when appropriate. We will provide relevant and regular training to our Employees related to such principles, policies, and procedures.

4.6. We will regularly monitor the application of these principles of conduct, including the procedures to identify, prevent and mitigate human right risks and adverse impact. We will adopt appropriate corrective measures if a violation of this Policy is detected in our operations or in our supply chain. If such violation constitutes a civil or criminal offense, we will report such incident to the competent government authorities pursuant to requirements of applicable law.

## **5. Review and Supervision**

The Board of Directors shall oversee that this Policy is implemented by the management through appropriate strategies, procedures, and guidelines. The Policy will be regularly reviewed and, when appropriate, updated and amended.

The Audit and Risk Committee shall be regularly informed of and have oversight of the conduct of the company with respect to this Policy.

The company will report on activities related to compliance with this Policy in accordance with applicable law.