

Recruitment policy for migrant employees

Purpose and scope

Royal Greenland recruits employees of a different origin than the nationality of the country where production takes place. The reasons may be a shortage of labour during some periods, but also locations with a large production and a shortage of available persons. Another reason may be a lack of qualifications in a particular field of work.

This policy is a basis for a fair recruitment process that meets recognized ILO standards. It covers all production units either owned by or affiliated to Royal Greenland.

Responsibility

Royal Greenland is responsible for recruiting and hiring employees in accordance with the Groups 'Human Rights policy' and must in particular focus on the following issues:

- Recruitment is free choice, e.g. forced, bonded or involuntary prison labour is prohibited.
- The employer does not keep any deposit or identity papers
- No employment costs shall be borne by the worker
- Child labour is prohibited
- Accommodation of workers must meet good hygienic standards
- Requirements to agencies

The management system to oversee the above areas is maintained by the Human Resource Department (HR). The Royal Greenland staff involved are trained in this policy and accompanying procedures.

Management system

An effective management system is the basis for an ethical and respectful relationship between employer and employee. A solid system is in place, which includes the following points:

- A written policy ('Recruitment Policy for migrant employees') specifying the conditions of recruitment and employment of migrant workers. The policy is actively communicated to all those involved in the matters of employment from recruitment to the end of the contract.
- A risk assessment of current direct and indirect recruitment practices.
- Management and monitoring of risks and practices at third party recruitment agencies or consultants.
- Service and contracts must be written in an understandable language between agencies and workers.
- Monitoring performance, e.g. audits of agencies, interviews with workers and grievance mechanisms.
- Review and audit.

Agencies

When a recruitment agency is used to find the best and most useful workers for the company, due diligence should be carried out before a contract is signed. Through a risk assessment, the ethical performance and conduct of the recruitment agency should be examined, particularly the points mentioned above under the section 'Responsibility'. When sub-agencies are engaged by the main agency all requirements in this policy must be passed on to them.

A contract between Royal Greenland and the main agency must be in place before recruitment begins. The contract shall be reviewed by the parties at least every third year. Both the agency and any sub-agencies must sign Royal Greenland's Code of Conduct for Suppliers.

Recruitment process

Royal Greenland offers the job with detailed information on job description, location, salary, start of the job and end of contract, holidays, working hours according to ILO standards, accommodation, etc.

An orientation meeting will be held for a potential selected group face to face or online with individual interviews.

The recruitment agency or Royal Greenland HR prepares the contract and all documents incl. travel documents for the workers.

Recruitment fee

Recruitment fee means any fee that an employee has to pay to get a job. In general, all costs are to be paid by Royal Greenland, except passport (ID). If it is later detected that a payment has been given either to an agent or to a RG employee, the matter will be investigated further and all costs documented with receipts will be paid to the worker.

Recruitment fee includes:

- Payments for recruitment services offered by employment agencies.
- Payments made by employees in connection with direct recruitment by employers
- Costs of compulsory medical examinations
- Costs of testing and training of skills and qualifications
- Travel expenses
- Costs of introduction and orientation programs
- Other administrative costs

In the case of international migration, recruitment fees and costs also include international travel and transport fees, approvals and permits, and pre-departure orientation.

Contracts with employees

There will always be a contract between the employee and Royal Greenland, signed by both parties and in place prior to travel to the destination. The contract must be written in a language legible to both parties or in dual language and both contracts must be signed.

Monitoring

During the recruitment process, workers are asked whether they have been forced to pay a recruitment fee.

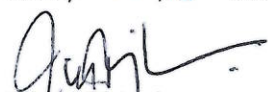
After 3-6 months of working for Royal Greenland, interviews are conducted with workers in order to ensure their understanding of working conditions and salary and whether they are content and satisfied with their work. During this interview, workers are asked again whether they have paid any recruitment fees or have any debts related to the recruitment process.

If there is suspicion, an audit of the recruitment process and involved parties will be carried out.

Accommodation

Royal Greenland provides accommodation of good hygienic standard for migrant employees. Each employee disposes of a private room, while couples are offered a double room. Employees have access to shared living, toilet, bathroom and kitchen facilities.

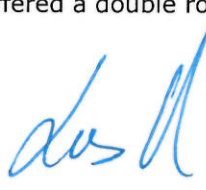
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