



Doc number: Sustainability – POL-1.06
Approved by: Anne-Christine Ahrenkiel
Executive Vice President,
Chief People & Culture
Officer
Confirmed by: Executive Group Management
Effective date: 19 January 2026

Hempel's Human Rights Policy

Purpose

Hempel commits to respecting human rights and supports goals of socially responsible and sustainable development. As a signatory to the United Nations Global Compact, our approach to human rights is guided by the UN Guiding Principles on Business and Human Rights (UNGPs), ILO's fundamental conventions and OECD Guidelines for Multinational Enterprises.

We endeavor to not infringe on human rights through our activities and to address actual and potential adverse human rights impacts around our operations and across our value chain. In support of this, we are committed to establishing robust due diligence processes, with the aim of identifying, assessing, preventing and mitigating human rights impacts that our business activity may cause, contribute to or be linked to. We comply with applicable national laws wherever we operate, and, where local legislation offers weaker human rights protection, Hempel adheres to international standards to an extent that is legally possible.

Our human rights policy supports Hempel's mission to build a brighter future with sustainable coating solutions, while ensuring the people we work with and the communities we may affect are treated with dignity and respect.

Scope

This policy applies globally to all management, employees, and non-employees across all Hempel Group entities, and to our business partners as well as other parties directly linked to our operations, products or services.

Responsibility

The Chief People & Culture Officer holds overall responsibility for policy governance and reports to the Executive Management Team and the Board of Directors. The Vice President of Sustainability coordinates implementation with the Procurement, Legal, HSE, People & Culture and Sustainability teams.

We expect our employees to assist us in our efforts in respecting human rights. Employees covered by this policy must:

- Read and understand this policy and act in accordance with it;
- Seek advice when in doubt about any aspect of the policy;
- Promptly raise any identified or experienced adverse impacts and
- Ensure that their own actions do not cause or contribute to adverse human rights impacts.

Employees are encouraged to share ideas on how we can strengthen our human rights performance. If an employee becomes aware of any severe impacts that Hempel may cause or be connected to, they are expected to report it immediately to their manager, People & Culture team, or through Hempel Ethics Hotline.



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This policy is reviewed every year, to remain fit for purpose of evolving human rights and business context.

These areas reflect where our operations, products and value chain have the greatest potential to be connected to human rights impacts:

Health, safety and environment

Health, safety and environment is an integral part of how we do business, and we are committed to ensure safe and healthy working conditions for all our employees. We secure the health of our employees and customers through detailed documentation on how to work with our products, and we provide the facilities, training and protective equipment needed to ensure a safe and healthy workplace. Through continuous improvements to our procedures and training, we strive for an accident-free workplace. Hempel maintains a global health and safety management system with 53% of our locations being certified to ISO45001 standards.

Diversity and equal opportunity

We promote diversity, equity and inclusion and have zero tolerance for discrimination or harassment of any kind and aim to ensure equal treatment and opportunities for all employees. We have a thorough process for reporting and investigating claims of harassment.

Hempel prohibits discrimination on the basis of any ground, including race, ethnicity, age, gender, gender identity, sex, sexual orientation, disability, medical condition, genetic information, colour, religion, country of origin, nationality, ancestry, caste, marital status, pregnancy, dependants, social class, role, union membership, political views or any other characteristic protected by EU legislation and local law or regulations. This applies to all areas and throughout the entirety of the employment process.

Fair compensation and wages

It is our commitment to provide employees with a fair and on-time pay for their work based on their performance, local legislation, and any relevant collective bargaining agreements. Furthermore, Hempel provides conditions for rest, leisure and paid holidays according to local legislation.

Freedom of Association

We support our employees' right to freedom of association and recognise their right to be a member of a union or other collective bargaining group. On occasion where local law does not allow for union membership, we allow our employees to form employee committees and elect representatives to engage in social dialogue on the workers' behalf.

Forced & child labour, and human trafficking

Hempel strictly prohibits any instances of child labour, forced labour or human trafficking. We also do not allow for processes and behaviours that may assist any of these human rights violations, including e.g. unreasonable working hours or withholding employees' documents.

Our expectations to Business Partners

At Hempel we appreciate our strong network of business relationships. Our expectations for business partners reflect the same internationally agreed minimum standard for responsible business conduct, to which we also hold ourselves accountable. Hence, our business partners shall, at minimum, align and implement the UN Guiding



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Principles and OECD Guidelines, and expect the same from their business partners. Our expectations for our business partners are further elaborated in our Business Partner Code of Conduct.

Grievance Mechanism

We maintain an open and accessible Hempel Ethics Hotline for employees, suppliers, and external stakeholders to raise concerns confidentially. As an employee you may also raise concerns regarding potential and actual adverse human rights impacts to your manager or P&C People Partner. Procedures for handling any complaints and misconduct are outlined in our Ethics hotline policy. No reprisal or retaliatory action will be taken against any individual for reporting concerns through any of the channels available.

Remediation

Where it is found that we have caused or contributed to an actual impact, we seek to provide access to remedy for affected stakeholders and prevent or mitigate re-occurrence. If we find that Hempel is linked to severe impacts, we will use our leverage to seek to make the causing or contributing entity cease and mitigate the impact.

Targets

In support of our commitments and to drive continuous improvement, Hempel has set the following goals by 2030:

We aim to strengthen our gender diversity by achieving no more than 60% of the same gender individuals across our general workforce and in leadership roles (+3 direct reports).

We prioritize health and safety and have ambition to eliminate all Lost Time Accidents (LTA) and other injuries (achieve 0 LTA/million work hours). We will develop and roll out training content to educate all employees on Human Rights principles and responsibilities. We aim to ensure strong ESG performance in our supply chain by achieving:

- 85% of direct spend with suppliers that show strong ESG performance
- 100% of direct spend with suppliers covered by ESG assessments (for high and medium human rights impact categories)
- 50% of indirect spend with suppliers covered by ESG assessments (for high and medium human rights impact categories)
- 100% of direct spend with suppliers that have undergone an audit (for high human rights impact categories in high-risk countries)
- 80% of suppliers to close Corrective Action Plans within the agreed time frame
- 100% direct and 70% indirect active suppliers to sign Hempel Business Partner Code of Conduct

A handwritten signature in black ink that reads "Michael Hansen".

Michael Hansen, Group President & CEO