

HUMAN RIGHTS AND ENVIRONMENTAL GRIEVANCE MECHANISM**Purpose**

Klubben AS is committed to providing accessible and transparent channels through which concerns relating to human rights, labour rights, environmental impacts, Fairtrade compliance and ethical business conduct can be raised and addressed.

The purpose of this mechanism is to identify, investigate and remedy adverse impacts in a timely and fair manner.

Scope

This mechanism applies to concerns related to:

- Human rights
- Labour rights
- Working conditions
- Environmental impacts
- Fairtrade requirements
- Responsible business conduct
- Violations of the Klubben AS Code of Conduct

Who Can Raise a Concern

Reports may be submitted by:

- Employees
- Suppliers
- Workers employed by suppliers
- Customers
- Business partners
- Local communities
- Trade unions
- Other stakeholders
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External Reporting Channel

External stakeholders may submit concerns through Klubben AS' public sustainability and contact channels available on the company website.

Reports may relate to:

- Human rights concerns
- Labour conditions
- Environmental impacts
- Fairtrade-related concerns
- Supplier conduct
- Ethical business practices

Website:

<https://www.klubben.no/velg-bærekraftig>

Email:

info@klubben.no

Postal Address:
Klubben AS
Solves gate 1
2270 Flisa
Norway

Internal Reporting Channel

Employees of Klubben AS have access to internal whistleblowing and reporting procedures through the company's digital employee handbook.

All employees receive access to these systems as part of their employment relationship.

The employee handbook includes:

- Internal reporting procedures
- Employee rights and obligations
- Relevant legislation and regulations
- Procedures for handling concerns and grievances

Handling Process

Step 1 – Registration

All reports are registered and assigned to a responsible person for review.

Step 2 – Initial Assessment

Klubben AS evaluates:

- Whether the matter falls within the scope of this mechanism.
- Severity and urgency.
- Need for immediate action.

Step 3 – Investigation

Relevant information is gathered through:

- Internal review
- Dialogue with involved parties
- Supplier communication
- Documentation review
- Site visits or audits where appropriate

Step 4 – Corrective Actions

Where adverse impacts are identified, corrective actions are agreed and documented.

Examples may include:

- Corrective Action Plans
- Supplier improvement measures
- Additional training
- Policy updates
- Enhanced monitoring

Step 5 – Follow-up

Klubben AS monitors implementation and effectiveness of corrective actions.

Step 6 – Closure

Cases are documented and formally closed once appropriate actions have been completed.

Confidentiality and Non-Retaliation

Klubben AS will handle reports confidentially to the extent possible.

No person shall suffer retaliation, discrimination or adverse treatment for raising concerns in good faith.

Continuous Improvement

Information received through this grievance mechanism is used as input to Klubben AS' Human Rights and Environmental Due Diligence process, Fairtrade compliance activities and annual risk assessments.

Responsibility

Overall responsibility for the grievance mechanism rests with the management of Klubben AS. The Sustainability Manager coordinates follow-up where relevant.

Approved by Management
Klubben AS

Signed:



Erik Heggelund
Managing Director



Kari Heggelund
Sustainability manager/Chairman of the Board