

People Policy



Áge Landro
Áge Landro, CEO

As a business we are committed to encouraging a safe, supportive and productive work environment.

It is important that we conduct ourselves with integrity, respecting the laws, cultures, dignity and rights of individuals in all the countries in which we operate.

The purpose of the People Policy (the “Policy”) is to outline the requirements of our global processes related to people and organisation, setting clear expectations in terms of business practice and personal conduct.

The Policy should act as a tool to give clear understanding of what is expected from you and what you should expect from us as a business.

Our people are our greatest asset and organising ourselves and our behaviours with clarity and consistency will help us turn talent into strength.

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Who does the people policy apply to?

The People Policy applies to Altus Intervention and its subsidiaries (including partly-owned subsidiaries), corporate affiliates, and joint ventures as well as all directors and employees thereof herein referred to collectively as the "Company".

It should be used as a guide not only to our terms and conditions of employment, but also to the wider environment in which we work.



Roles & responsibilities

Line manager

Our line managers are responsible for their people, implementing our Company policies, managing people processes and facilitating learning and development. They are expected to actively lead and promote the implementation of the People Policy and create an environment that embraces our Company Values.

In particular, line managers are responsible for:

- Ensuring that all employees understand and act in compliance with the People Policy.
- Ensuring compliance with country-specific laws and regulations relevant to the people and organisation processes.

Employee

Our employees are responsible for making themselves familiar with the People Policy and to conduct themselves in accordance with its principles. Issues and problems should be brought to the attention of line or HR management as early as possible. These are all fundamental elements of the way we work.

The Company expects you to strive to achieve the objectives agreed between you and your line manager and that you contribute to the overall success of your colleagues, work teams, departments, projects, business area and the Company through actively sharing your knowledge and experience across the whole organisation.

It is your responsibility to manage your career and continuous personal and professional development, using the appropriate and relevant resources made available to you within the Company.

Human resources

The HR function in the Company provides HR strategies, policies and frameworks that support the vision, values and business strategy of the Company. HR is responsible for driving strategic organisational initiatives and building an HR framework that enables the growth and execution of the Company's business strategy.

- The HR function provides expert HR support and services to management – including advice regarding best practices, processes and HR tools/technology for managing people and their performance.
- Corporate HR is responsible for deciding and shaping people related policies and standards as well as the functional strategy for the Company globally. Corporate HR ensures alignment throughout the corporation by reviewing compliance with, and the effectiveness of people related policies, processes, and frameworks across the Company globally, and revising appropriately.
- Based on the corporate frameworks, regional HR adapts Corporate HR strategies and policies to the specific regional situation and ensures compliance with regional regulations and legislation.
- Regional HR is responsible for ensuring that the HR strategy, processes and practices are implemented throughout their region. The regional HR functions are responsible for the creation of the regional HR plans that are to be approved by Corporate HR ensuring alignment with local strategies and with the Corporate HR strategy. They are responsible for monitoring the appropriateness of the policies for their region and suggesting improvements.



Anyone violating the business ethics policy shall be subject to appropriate disciplinary action

General principles

Business ethics and conduct

We are each responsible for conducting ourselves with integrity and in compliance with the Business Ethics Policy.

It is the intent of the Company to have all employees conduct themselves in ways that demonstrate uncompromising ethical standards in all of their dealings with customers, suppliers, governments, the public, and each other. The integrity of the Company rests on the integrity of its employees.

As the Company continues to expand globally, we must be sensitive to cultural differences while ensuring continued adherence by our employees to the Company's high ethical standards.



Whistle blowing

If at any time a Company employee or hired personnel has engaged in, is about to engage in, has been asked to engage in, or suspects others have engaged in, conduct that may violate the Company's Business Ethics Policy, then any employee with knowledge of the matter shall immediately report this as suggested below. No matter how reported, there shall be no retaliation or harassment of employees who report possible violations in good faith.

Each manager is responsible for overseeing the conduct of each employee and hired personnel under his/her supervision and to ensure their compliance with the Business Ethics Policy. Anyone violating the Business Ethics Policy shall be subject to appropriate disciplinary action. Serious misconduct may result in termination of employment or the engagement.

There are several alternatives available to ask questions about or to report actual or perceived violations of the Company's Business Ethics Policy. These alternatives are as follows:

- The immediate manager should be the primary resource in most instances.
- The next step should be to seek the advice of anyone in the department's chain of command. In other words, the "open door policy" should be used.
- Further alternatives include an HR official at the location, email ethics@altusintervention.com or physical mail to Legal following which an appropriate follow-up will be agreed with you.

The Company encourages all to disclose their identity when reporting a concern or suspected breach but will also accept anonymous reports.

Any notice will be processed with discretion from the recipient, and proceed with HR and Legal for a more comprehensive investigation. The individual will be notified when the investigation process is initiated.

Local laws and country-specific requirements

Country-specific People Policy requirements will be developed when required to incorporate local laws and regulations.

Local requirements and standards shall be in accordance with local statutory law and regulations. In the event of a conflict, local statutory law and regulations shall prevail.

One-over-one

The one-over-one approval process (sometimes also known as "the grandfather principle") shall apply to all important decisions relating to employee and organisational changes. These shall include but not be limited to:

- Recruitment, promotion, demotion or dismissal.
- Adjustments to compensation (included benefit packages).
- Other relevant employee and organisational matters.

This principle requires that two levels of management shall be involved. The direct line manager shall recommend action. His or her manager shall review the recommendation and has the authority to accept or reject it.

Immediate family

Employees and external hires shall not work in the same team as their parent, grandparent, spouse, common-law spouse, child, sibling or any person with whom they have close relations. Nor shall they be in a reporting relationship to such person. The assessment of close relations shall take into account whether working in the same unit would undermine the confidence in the employee's own impartiality, integrity of work or whether it in any way would be a disadvantage for the Company and other employees.



We will not tolerate any form of harassment

Equal opportunities

Any discrimination on the basis of race, color, religion, sex, gender identity, sexual orientation, age, disability, national origin, or any other unlawful factor is prohibited. Employees in the Company shall be provided equal opportunities and will only be selected or promoted based on their qualifications and performance.

Harassment

The Company prohibits any form of harassment. We will provide a work environment that fosters mutual employee respect and working relationships free of harassment. Forms of harassment include, but are not limited to, unwelcome verbal or physical advances, sexually, racially or otherwise derogatory or discriminatory materials, statements or remarks. All employees will be subject to disciplinary action up to and including termination for any proven act of harassment.

Individuals who believe they have been subjected to harassment should immediately report the incident to their manager, higher management or their HR contact, or through established “whistle blowing” channels. All complaints will be promptly and thoroughly investigated. The Company will treat such complaints confidentially, releasing information only to those with a need or right to know.

Disciplinary measures

Disciplinary measures shall be carried out by the authorised line manager with support from HR. Disciplinary measures shall be reviewed by legal resources when required. Written documentation shall be produced and filed in accordance with local legislation.

Employment principles

Recruitment

The decision to recruit or appoint an individual to a position is one of the most important and critical decisions to be made by any manager. A quality process is essential to ensure that we recruit the right individual for the right job.

The following guidelines apply:

- Recruitment shall be conducted using standardised tools and recruitment principles.
- The internal job market shall be the Company's main deployment mechanism. Open positions will be advertised internally. Deployment as a result of change processes, planned rotation and career development may under the circumstances not be advertised.
- All vacancies expecting external applicants shall be advertised externally on the Company's web pages and other media if appropriate.
- All data collected shall be managed in an appropriate manner conforming to local data protection laws.
- Corporate management shall be consulted on, or involved in, all employments that carry full balance sheet or significant profit and loss responsibility.
- Before an internal candidate is called for an interview, their leader shall be informed about the candidacy. Internal recruiting without first advising the appropriate people is not acceptable.
- When hired, all new employees shall be exposed to the global on-boarding process.
- Relatives, spouses or partners of customers, prospective customers or public bodies involved in licensing or regulating our activities must not be offered employment with us or temporary work without the consideration and approval of HR.

Transfers and promotions

Employees are encouraged to maintain an awareness of internal vacancies and to seek job opportunities for which they qualify. An expression of interest in a transfer or promotion, either by submitting an application as a result of a job posting or through discussions with a manager, will in no way have any adverse effect on the status of the employee's current position.

The Company may initiate transfers or promotions at any time in response to the needs of the organisation and the needs of staff members.

International assignments

As an international company exploring new business opportunities in locations around the world, there will be a need to assign employees to countries other than their country of employment or residence, resulting in an international assignment. The Company will ensure that the international assignment of employees is managed consistently across the business.



Success in achieving our business goals is dependent upon our ability to develop our people

Performance and development

It is our goal to foster a strong organisation with commercial drive and leadership based on our Company Values.

Success in achieving our business goals is dependent upon our ability to develop our people. We aim to develop our employees to create a basis for long-term, sustainable value creation in the Company. Employees shall have the opportunity for continuous learning to improve their job performance and broaden their capabilities. HR together with our leaders will drive the development of our people and identify corporate and local training and development activities.

The following guidelines apply:

- New employees shall participate in a planned induction to the Company and their role.
 - Employees who transfer from one department to another shall be inducted into the new role; this induction needs to be particularly detailed when the transfer involves moving between businesses or functions, relocating internationally or being appointed to a new leadership role.
 - Where appropriate and practical, mentoring and coaching shall be considered.
 - The majority of training and development activities will be based in-house and involve line management, utilising external resources for specialist skills and knowledge acquisition not readily available internally.
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The performance dialogue between the manager and employee is a key building block in performance management and the creation of a high performing company. The performance dialogue focuses on clarification of the employee's job accountabilities, setting clear objectives, following up progress, evaluating performance and employee development. Employees are expected to set high but realistic objectives while actively seeking challenges and development opportunities. Following up on employee performance is not a once-per-year exercise, but one of the most critically important, continuous processes in our company.

The following guidelines will apply:

- As a minimum a once-per-twelve months dialogue between the employee and his/her manager shall be carried out to discuss performance, results, behavior, future objectives and employee development.
- Formal and informal follow-up dialogues throughout the year will update objectives, clarify progress and give recognition.
- It is also essential to recognise where performance has been unsatisfactory, consider if improvements can be made and - if not - how that impacts the employee.

Compensation and benefits

Our reward concept is based on individual performance and company performance and shall:

- Reflect our competitive market strategy and local market conditions.
- Be fair and transparent.
- Reward and recognise delivery and behavior equally.
- Differentiate on the basis of responsibilities and performance.
- Reward both short-term and long-term contributions and results.

The financial framework for an annual base salary review shall be based on the Company's financial situation.

Payroll will be run according to local legislation.

Termination

By the nature of our business our work force levels will fluctuate, depending on the level of work available to the Company.

The following guidelines apply:

- In the case of re-organisation that entails down-sizing or cutbacks, HR will ensure that the process is conducted in accordance with local legislation.
- In the event that we have hired, selected, or promoted individuals who, ultimately, do not fulfill our expectations in the role assigned, and corrective counselling and improvement interventions have not helped, we must be prepared to make tough decisions and reassign the individual (if there is a suitable alternative position available) or to release him/her. We shall always be transparent about issues requiring reassignment or release.



Retirement

The retirement age in the Company will be set according to local legislation.

Exit interviews

When an employee resigns voluntarily an exit interview designed to provide feedback and suggestions for improvements shall be offered and conducted by HR.

Change management

As a company we will always be required to consider change as part of the development and improvement of the Company. The following requirements apply to change management and continuous improvement processes:

- Change processes shall be characterised by openness, involvement and speed of implementation.
 - The need for change shall be clearly communicated to those concerned. Involved parties shall be informed at the earliest possible stage of an organisational change process.
 - Consequences for health, safety and environment, as well as for people and the organisation, shall be assessed before decisions are made.
 - Our culture and working environment shall be assessed on a regular basis through an Employee Opinion Survey. The results shall be discussed with our employees and our leaders. Areas for improvement shall be followed up.
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Personnel data protection

The Company is committed to process personal data in a lawful way. Personal data shall be processed only to the extent it is required for a specified, explicit and legitimate purpose and used accordingly or for a purpose that is required by law in places where we operate. Information shall be accurate and where necessary, kept up to date and records shall not be retained longer than necessary.

Access to personal data is strictly limited to personnel who have appropriate authorisation and a clear business need for that information. Those with access to personal data must use it only for the purpose for which it was collected and must adhere the highest standard of confidentiality in using it.

Intellectual Property

Intellectual Property is an instrument to meet the Company's strategy for maintaining a competitive edge and ensuring profitable growth. The Company will promote an innovative environment to expand and further develop our internal know-how.

Patents, trademarks and other formal Intellectual Property registrations are actively used as tools for protection of the domain of operation, and we are likewise committed to the principle of respecting the Intellectual Property rights of others.

Substance abuse

The Company wants to ensure a safe and healthy work environment in our facilities, offices and other work locations for our employees and customers. The Company has a zero tolerance approach to drug, alcohol or any other substance abuse. The Company requires employees, vendors, suppliers, and visitors to ensure that their work performance is not impaired by the use of illegal drugs, prescribed drugs, other medicines or alcohol.

This applies while on company property or conducting company business at any other location whatsoever, including clients' premises. Employees are also responsible for absolute compliance with clients' rules when working with, or visiting, the client.

Any breach of these requirements will be considered to be misconduct and may result in disciplinary action up to and including dismissal.

Travel

We aim to achieve cost-efficiency while meeting business requirements and ensuring safe and secure travel for our people. Travellers must book their flights via the locally approved travel agency. This is done for security tracking, insurance and payment reasons. Travellers need their line manager's permission prior to booking their travel, and should follow the Company Travel standard.

For more information:

If you have any questions or concerns regarding the People Policy please contact your local HR representative.

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