

Human Rights Policy

January 2025

1. Introduction and Purpose

DLR strives to uphold human rights and always treat employees, partners, and customers with dignity and respect. We recognize the importance of ensuring that human rights are observed and protected.

Due to the nature of DLR's business as a financial institution, the primary risks of human rights violations in our operations are related to the working conditions of DLR's employees. Additionally, there may be risks concerning our partners, suppliers, and customers.

DLR's human rights policy is based on the Danish labor market model and the protection of internationally proclaimed human rights as described in the UN Universal Declaration of Human Rights and the ILO's declarations and recommendations.

The Danish labor market model and internationally proclaimed human rights together form the foundation of a safe, fair, and equitable society where equality, inclusion, workers' rights, safety, and health are deeply rooted values.

Our goal is to continuously improve our ability to manage human rights risks. This is an ongoing effort supported by increased awareness among DLR employees about human rights-related issues.

DLR has an independent whistleblower system available for employees to report suspicions of or observed violations of human rights.

2. Workers' Rights

DLR's employees are covered by the Finance Sector Standard Agreement (STOK), which ensures that employment conditions are negotiated between the Finance Sector Employers' Association and the Financial Services Union. The agreement covers working hours, salaries, pension contributions, health insurance, vacation, education, and skill development, as well as various social provisions, including parental leave, illness, and leave for caring for seriously ill children and close relatives.

3. Right to Organize

DLR respects employees' right to organize and collaborates closely with union and health and safety representatives through DLR's Cooperation and Occupational Health Committees. DLR systematically works to maintain a safe and healthy work environment and to develop employees' awareness of their own and their colleagues' safety.

4. Offensive Behavior

DLR has clearly formulated guidelines for preventing and addressing offensive behavior. DLR does not tolerate any forms of offensive behavior, including bullying, harassment, sexual harassment, violence, threats of violence, and discrimination, whether directed at employees, leaders, or guests. Offensive behavior is entirely unacceptable, regardless of its form or method. DLR continuously monitors offensive behavior.

Employees experiencing offensive behavior can report it to their immediate supervisor, union or health and safety representatives, HR, or anonymously via DLR's whistleblower scheme.

5. Suppliers, and Customers

DLR treats partners, suppliers, and customers with respect and expects them to observe and protect human rights as well. If DLR becomes aware that partners, suppliers, or customers do not comply with human rights, it will have consequences for the collaboration moving forward.

6. Complaints

If a customer is dissatisfied with DLR's handling of a case, there are multiple avenues for lodging a complaint about the case processing. Detailed information about DLR's complaints procedure is available on dlr.dk.

This "Human Rights Policy" was translated in January 2025 and is based on "Politik for menneskerettigheder" approved by the board of directors of DLR Kredit A/S at its meeting on October 31, 2024. The policy will be submitted for re-approval by the board no later than 24 months from this date.