

Transparency Act statement 2025

1. Introduction

1.1 The Norwegian Transparency Act

On 1 July 2022, the Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (the Transparency Act) entered into force in Norway. The Act is based on the UN's Guiding Principles on Business and Human Rights (UNGP) and the OECD's guidelines for multinational enterprises, and shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services, and ensure the general public access to information regarding how adverse impacts on fundamental human rights and decent working conditions is addressed.

By *fundamental human rights* we mean the internationally recognised human rights that are enshrined, among other places, in the International Covenant on Economic, Social and Cultural Rights of 1966, the International Covenant on Civil and Political Rights of 1966 and the ILO's core conventions on fundamental principles and rights at work. By *decent working conditions* we mean work that safeguards fundamental human rights and health, safety and environment in the workplace, and that provides a living wage.

According to the Transparency Act, HAV Group is required to undertake human rights due diligence assessments and report annually on the work, risks, and potential and actual impacts on human rights. The following subsidiaries of HAV Group ASA are subject to the Act and required to publish statements; HAV Design AS ("HDE"), Norwegian Greentech AS ("NGT") and Norwegian Electric Systems AS ("NES").

1.2 Our policy for handling requests of information

For information about how HAV Group or its subsidiaries handles actual and potential adverse impacts to fundamental human rights and decent working conditions in its supply chains, please contact office@havgroup.no. Enquires will be answered as swiftly as possible and within reasonable time.

1.3 The Group

HAV Group ASA, together with its main subsidiaries (hereafter referred to as "the Group") is an international provider of technology and services for maritime and marine industries. Although formally established in 2021, the Group has several decades of industry experience and possesses special expertise in guiding the marine and maritime industries towards zero emissions. The Group's services and solutions include:

- SHIP DESIGN: Supplier of innovative ship design, pioneering the design and construction of zero and low-emission vessels
- ENERGY DESIGN AND SMART CONTROL SYSTEMS: Supplier of sustainable energy systems, electric propulsion, automation and NavCom systems for a wide range of vessels
- HYDROGEN-BASED ENERGY SYSTEMS: Supplier of zero-emission hydrogen-based energy systems for vessels
- WATER TREATMENT SYSTEMS: Supplier of ballast water treatment system and other process water treatment systems for aquaculture and maritime use

Our experience and expertise, as well as the focus on efficiency, safety, and sustainability, lays the foundation for developing and delivering high-quality innovative solutions to our customers in the seafood, energy, and transport sectors.

The Group is headquartered in Fosnavåg, Norway, with offices in Bergen, Ålesund and Egersund (Norway), Sopot (Poland), and Istanbul (Turkey).

2. Embedding due diligence in governance, strategy and business model

Sound corporate governance forms the basis for the Group's value creation. Our corporate culture is founded on good business practice, openness, honesty, and respect for other people. The Group shall adhere to integrity, governance, and responsible business practices in all our operations.

We strive to ensure that our internal control mechanisms, organisation, and management structures comply with sound corporate governance principles. The Group has implemented guidelines (policy documents) related to fundamental human rights and decent working conditions within the enterprise and throughout the supply chain. The guidelines are part of our efforts to embed responsible business conduct into policies and management systems.

The Group operate under the same overarching Code of Conduct, Supplier Code of Conduct and reporting systems and procedures to facilitate internal and external notifications.

2.1 Code of Conduct

Our main governing documents for dealing with ethical business conduct and human rights specifically are the Group's Code of Conduct for Business, Ethics and Corporate Social Responsibility (the "Code of Conduct") and the Supplier Code of Conduct. Both documents are available on <https://www.havgroup.no/about/corporate-responsibility/>

The Code of Conduct has been adopted to underscore the principles by which we conduct our relations with employees, business partners and other stakeholders. The Code of Conduct applies to all Board members and employees.

2.2 Supplier Code of Conduct

We are committed to conducting our businesses with integrity, in accordance with internationally proclaimed human rights and with the aim of furthering sustainable development and we recognise the importance of our suppliers, contractors, subcontractors, distributors, agents, consultants, and joint venture partners in achieving this pursuit.

The Supplier Code of Conduct communicates the Group's expectations for suppliers and business partners, and any supplier of the Group is required to comply with it. The Supplier Code of Conduct includes information about compliance with legislation, respect for human and labour rights, decent working condition, child labour, working hours, wages, non-discrimination, freedom of association, health and safety, etc.

2.3 Whistleblowing – the Integrity Channel

The Group has established reporting systems and procedures to facilitate internal and external notifications if circumstances can be found to exist that are subject to penal sanctions, or that are in violation of statutory obligations or prohibitions, or in breach of the Code of Conduct or generally accepted ethical standards. Examples of violations include, but are not limited to, fraud and corruption, harassment and discrimination, and violations of environmental and human rights laws. There is no requirement that the whistleblower can prove the event, act, or omission.

Reports of concerns can be made through the Group's Integrity Channel available at <https://www.havgroup.no/about/corporate-responsibility>, which offers the whistleblower the possibility to report anonymously, and where the whistleblower's identity will be kept confidential to the extent permitted by the applicable personal data regulations. Employees and external parties are encouraged to use their right and responsibility to report concerns.

3. Engaging with affected stakeholders in all key steps of the due diligence

We encourage suppliers, consultants and other business partners within our sphere of influence to adopt the principles of the Code of Conduct, and in the assessment of potential and current suppliers, the principles described in the Supplier Code of Conduct shall be applied. The supplier, business partners and customers where relevant, are expected to report on potential and actual adverse impacts, and if any potential or actual adverse impacts are detected, the Group may require appropriate efforts to rectify the situation. The Group takes a partnership approach by proactively seeking continuous improvement from suppliers, business partners and customers where relevant. In severe cases, or where adequate corrective measures are not implemented, the Group may consider escalation or contractual remedies where available and proportionate.

4. Identifying and assessing adverse impacts

4.1 Prioritisation in the Group

The Global Economy's Human Rights and Rule of Law Index considers the relationship between the state and its population insofar as fundamental human rights are protected and freedoms are observed and respected. The higher the indicator's value, the less protected are the human rights and the rule of law in the country.

Although the Group has offices in Poland, Croatia and Turkey, our main operations take place in Norway, where the risk of human rights violations is perceived to be low (0.2 as per the Human rights and Rule of Law Index 2024). However, the Group is also dependent on suppliers that operate globally, which makes human rights violation and decent working conditions important topics for us.

In 2025, the Group updated its due diligence policy and assessments of existing suppliers. In these assessments, we have listed suppliers across the Group (more than 100) based on for example size, industry, and country of operations. We have also looked into whether the supplier itself is subject to the Transparency Act as well as the Norwegian law on collective bargaining agreements, which many of our suppliers are.

In addition to suppliers, the Group's due diligence work also covers relevant business relationships, including customer and project relationships where the Group's employees or subcontractors may perform work at customer-controlled premises or onboard vessels under construction.

This is particularly relevant for the Group which deliver design, systems and related services to international maritime projects and shipyards. In line with a risk-based approach, the Group considers factors such as geography, industry, type of project, expected site presence, use of subcontractors at the relevant premises, and the customer's ability to document safe and decent working conditions.

Where the initial assessment indicates elevated risk, the Group may apply enhanced due diligence measures, including additional contractual requirements, requests for information and documentation, project-specific risk assessments, meetings with the customer, and, where relevant, inspections or audits.

4.2 Due diligence process

The Group has implemented guidelines to identify and assess adverse impacts, prevent and mitigate such impacts, track improvements and communicate any findings and results. Such due diligence processes are carried out regularly, proportionally to the size of each enterprise, the nature of the businesses, the context of the operations, and the severity and probability of adverse impacts on fundamental human rights and decent working conditions.

As part of our due diligence processes, we have created an initial overview of our areas of operations and type of relationship with suppliers and business partners. Based on the initial scoping process, we perform a risk and impact assessment of prioritised operations, suppliers and business relationship to identify and assess specific actual and potential adverse impacts. Where significant risks or impacts are detected, the Group will consider how to cease, prevent or mitigate the adverse impacts and/or risks in accordance with its guidelines. Results are tracked and reported on, in accordance with the Transparency Act.

Assessments of the potential adverse impact on human rights and decent working conditions are always made when entering into contracts with new suppliers, and entails for instance that the supplier receives information and accepts compliance with our ethical guidelines, request for more information from the supplier itself and some suppliers also have to fill out our ESG questionnaire where we request information on topics such as:

- Due diligence and supply chain management
- Human rights and decent working conditions
- Use of short-term employment
- Forced labour
- Child labour
- Working hours, wages, and benefits
- Non-discrimination
- Freedom of association
- Health and safety

The Group's due diligence work may, where relevant and appropriate, take into account customer and project relationships, including activities at foreign shipyards. However, this is not intended to impose on the Group any responsibility for the customer's or shipyard's general operations, workforce, subcontractors or overall compliance with applicable labour, human rights or health and safety standards.

The purpose of such due diligence is to identify potential risks connected to the Group's own operations, deliveries, personnel, subcontractors or project activities, and to consider proportionate measures. Where appropriate, the Group may seek to use its leverage to encourage responsible practices and promote respect for health and safety and decent working conditions in connection with the relevant project, as further described in chapter 5.

4.3 Results

The 2025 due diligence assessment confirms that the risk of human rights breaches in the Group's own operations is generally low. The Group has identified certain risks related to parts of the supply chain, see chapters 4.3.2 and 4.3.3. In addition, we have identified a potential risk related to certain customer and project relationships involving yards in some international markets, as further described in chapters 4.3.1, 4.3.2 and 4.3.3.

No actual adverse impacts on human rights or decent working conditions have been identified in 2025.

4.3.1 HAV Design AS ("HDE")

Based on previous assessments, we have found terms of employment, wages and workhours, discrimination, health and safety, data privacy and sexual harassment to be the main risk areas for HDE. These are considered when choosing suppliers and business partners.

In the 2025 due diligence assessments, no negative impact on human rights and decent working conditions has been identified in HDE. However, HDE has identified a potential risk related to yards in some international markets.

HDE provides design, equipment packages and related services to international shipyards. The potential risk is particularly linked to working conditions and occupational health and safety at customer-controlled shipyard premises, including the extensive use of unorganised subcontractors and historical challenges with serious occupational health and safety incidents at yards in some international markets.

The potential risk is primarily connected to premises and activities outside HDE's direct operational control. However, HDE may be directly linked to such risks through its business relationships and project execution activities, particularly where HDE's personnel or subcontractors are present at the relevant premises. HDE therefore considers this a prioritised risk area requiring continued project-specific attention.

4.3.2 Norwegian Greentech AS ("NGT")

No negative impact on human rights or decent working conditions has been identified for NGT in 2025. The company has identified risks related to some of its suppliers which are operating in countries where the risk of human rights breaches is higher, where the supplier has a lot of sub-suppliers, is dependent on a high degree of foreign workers, and/or are operating in risk-related industries such as textile, cleaning, and transport (where wages and occupational health and safety can be a risk). However, NGT have a long-term cooperation with several of our suppliers, which is likely to reduce such risks.

In addition to supplier-related risks, NGT has identified a potential risk related to certain customer and project relationships involving shipyards outside Norway. NGT delivers ballast water treatment systems and other process water treatment systems for maritime use, and such systems may be installed, commissioned or serviced at customer-controlled shipyard premises.

The potential risk is particularly linked to occupational health and safety and decent working conditions at customer-controlled shipyard premises. Relevant risk factors include the use of

unorganised subcontractors within shipyard premises, and historical challenges with serious occupational health and safety incidents at yards in some international markets.

Due to the potential severity of harm and the possibility that NGT's personnel or subcontractors may be present at such premises during installation, commissioning, supervision or service activities, NGT considers this a relevant risk area requiring project-specific attention where such exposure exists. NGT will assess such risks on a project-by-project basis, taking into account the location of the yard, the nature of the work, expected site presence, and available information regarding the customer's health and safety management and subcontractor controls.

4.3.3 Norwegian Electric Systems AS ("NES")

No negative impact on human rights or decent working conditions has been identified for NES in 2025. The company has identified risks related to some of its suppliers which are operating in countries where the risk of human rights breaches is higher, where the supplier has a lot of sub-suppliers, is dependent on a high degree of foreign workers, and/or are operating in risk-related industries such as textile, cleaning, and transport (where wages and occupational health and safety can be a risk). However, NES have a long-term cooperation with several of our suppliers, which is likely to reduce such risks.

In addition to supplier-related risks, NES has identified a potential risk related to certain customer and project relationships at yards in some international markets. NES delivers energy systems, electric propulsion, automation and related services to vessels that may be constructed, commissioned or serviced at international shipyards.

The potential risk is particularly linked to occupational health and safety and decent working conditions at customer-controlled shipyard premises. Relevant risk factors include the use of unorganised subcontractors within shipyard premises and historical challenges with serious occupational health and safety incidents at yards in some international markets.

Due to the potential severity of harm and the possibility that NES' personnel or subcontractors may be present at such premises during project execution, commissioning, supervision or service activities, NES considers this a relevant risk area. NES will assess such risks on a project-by-project basis, taking into account the location of the yard, the nature of the work, expected site presence, and available information regarding the customer's health and safety management and subcontractor controls.

5. Taking actions to address adverse impacts and risks

In addition to implementing relevant policy documents, a channel for reporting irregularities and distributing a supplier questionnaire, the Group has taken a number of measures in order to mitigate risks in our supply chain and relevant business relationships, for example, we have collected additional information about selected suppliers, such as certifications obtained, their sustainability/CSR report or other relevant documentation, which is saved and evaluated/discussed. We have also checked whether our suppliers have implemented their own ethical guidelines, are members of the UN Global Compact (UNGC) and/or are certified according to the ISO 9001 certification (Quality Management System).

For projects involving work at customer-controlled shipyard premises outside Norway, we have implemented contractual requirements intended to prevent and mitigate risks related to occupational health and safety and decent working conditions.

The contractual requirements include obligations for the buyer (shipyard) to comply with applicable laws, regulations and rules regarding safety and working environment, and to provide necessary information concerning safety regulations and rules at the buyer's premises and onboard the vessel. Before HAV Group personnel or our subcontractors arrive on site, the buyer shall ensure that no work or supervision is carried out in unhealthy or dangerous surroundings, and that necessary safety and precautionary measures have been taken and are maintained.

The buyer is also required to report work accidents on site, including accidents with actual or potential personal injury, in writing without undue delay. Personnel of HAV Group companies or their subcontractors are entitled to refuse to perform work, without assuming liability, if working conditions at the site or vessel are deemed unsafe or dangerous according to applicable laws and regulations and/or standard industry practice in Western Europe.

Furthermore, the buyer shall grant reasonable access to the vessel and relevant premises to inspect compliance with applicable laws, regulations and rules regarding safety and working environment, subject to prior written notice. During such audits, the buyer shall provide reasonable information requested, and shall warrant that responses and related information provided in connection with the audits are accurate and complete.

The Group does not control the day-to-day operations of customer-owned or customer-controlled shipyard premises. The measures described above are therefore intended to use the Group's contractual rights and commercial leverage to prevent, mitigate and follow up risks to the extent possible and proportionate in the relevant project context.

These measures are expected to strengthen the Group's ability to prevent and mitigate risks at customer-controlled premises, improve access to relevant information, enable escalation where unsafe conditions are identified, and support verification of compliance through inspections or audits where considered necessary.

6. Tracking the effectiveness of efforts and communicating

Going forward, we will continue our due diligence assessments of suppliers, in particular those that are using a significant number of subcontractors or a high degree of foreign workers, to make sure that wages and decent working conditions are considered. We will also make sure that all suppliers have received and accepted to comply with the Supplier Code of Conduct.

The Group will also continue to develop its risk-based approach to customer and project relationships involving work at customer-controlled premises. For relevant projects involving foreign shipyards, the Group will consider enhanced due diligence measures proportionate to the nature and severity of the identified risk.

Such measures may include requesting information regarding the customer's health and safety management system, accident and near-miss reporting procedures, emergency preparedness, and grievance or reporting channels available to workers at the site.

The Group will track the effectiveness of its measures through project evaluations, information received from customers, reports from employees or subcontractors present on site, accident or near-miss reporting, and any findings from site visits, inspections or audits. Where significant risks or non-compliance are identified, the Group will assess appropriate follow-up measures, including dialogue with the customer, corrective action requests, suspension or refusal of unsafe work, escalation within the Group, or use of contractual remedies where available and proportionate.

These measures are likely to further reduce the risk of negative consequences and halt present activities that might have negative impact.