

The Transparency Act, Norsap as.

"POLICY"/ PURPOSE

Norsap shall promote companies' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. We will help to ensure public access to information about how businesses deal with negative consequences for fundamental human rights and decent working conditions.

ROUTINE

The company's routine shall help ensure that our business and our cooperation with suppliers promote the purpose and duty of disclosure in the Transparency Act, as well as ensure that our business meets the requirements for performing and accounting for due diligence.

CIRCUMFERENCE

The routine includes due diligence related to direct and indirect purchases in our business. Due diligence is based on a risk-based approach.

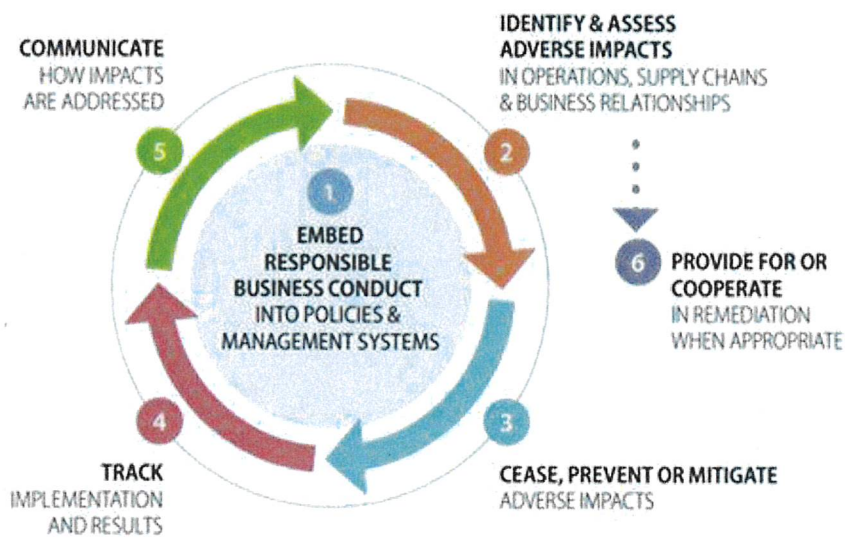
RESPONSIBILITY

The CEO is overall responsible for the routine and shall, in consultation with the technical managers, ensure that due diligence is carried out in the various parts of our business' business areas. In cases where information is required from Norsap, the CEO must assess the response before sending it.

DESCRIPTION

Due diligence shall be based on the OECD model for due diligence for responsible business conduct:

FIGURE 1. DUE DILIGENCE PROCESS & SUPPORTING MEASURES



CONDUCTING DUE DILIGENCE

Due diligence shall be carried out according to the following working methodology:

- Fixed point at management meeting/management review.
- A working meeting shall be held for the conduct of due diligence at least 1 time per year in connection with quality audits.
- In the workshop, risk mapping is carried out related to our purchases of goods and services.
- Based on risk mapping and prioritization/materiality assessment, priority shall be given to areas for improvement and measures.
- The results of risk mapping are documented in a written statement. In accordance with the Transparency Act, the written statement from our due diligence assessments is published readily available on our company's website.
- In accordance with the Transparency Act, we provide information in the annual report about routines, measures, and risk, as well as where the report is available. The report is made by 30 June each year.

MEASURES TO STOP, PREVENT AND REDUCE NEGATIVE IMPACT/HARM:

- Based on risk mapping and prioritization/materiality assessment, specific measures shall be assessed and decided by management and/or possibly the board.

CHANGES, MEASURES AND FOLLOW-UP:

- If our operations in a purchasing area become aware that there may be significant changes in supply chains, the technical managers shall follow this up and, if necessary, ensure that due diligence assessments are revised and documented in a written statement.

DEVIATION

- In the event of suspected breach of contractual obligations related to the Transparency Act, deviations must be reported immediately.
- The person responsible for the department will follow up the procurement and respective supplier to our business.
- Treatment of nonconformities is documented in a written statement.
- The CEO shall be informed immediately of suspected nonconformities related to the Transparency Act.

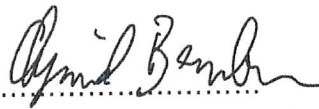
PROCESSING OF INFORMATION CLAIMS

- Everyone has according to. Upon written request, the Transparency Act is entitled to information on how our business handles actual and potential negative consequences related to human rights and decent working conditions in our supply chains. This includes both general information and information relating to a particular good or service offered by the enterprise.
- If we receive a request for information, the person responsible for the course / purchaser must be contacted for answering and handling the information requirement. point about liability.

REFERENCES AND RELATED DOCUMENTS

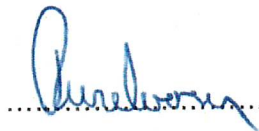
- Act relating to corporate transparency and work on fundamental human rights and decent working conditions (Transparency Act, LOV-2021-06-18-99).
- Norsap Supplier form for quality, environment and HSE (Ethical Guidelines).

Kristiansand, 9. March 2023



Øyvind Berntsen

Chairman of the Board



Rune Iversen

Board member



Ove Jensen

Board member / CEO