

Survitec Group Norway AS

Transparency Act Statement



This Statement has been approved by the Chairman of the Board and Managing Director of SGN for the applicable period of 01.01.2025-31.12.2025

Ålesund, 30.06.2026

A handwritten signature in blue ink, reading "Jan Eskil Hollen", written over a horizontal line.

Jan Eskil Hollen
Chairman of the Board/Managing Director
Survitec Group Norway AS

Survitec

Survitec Group Norway AS

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VAT Number: 912 237 788
Registered In: Norway
Company Registered Number: 912 237 788

[Table of contents](#)

Innhold

Survitec Group Norway AS	1
Transparency Act Statement	1
Table of contents	2
1. Background.....	3
2. Organization of business and operating area	4
3. Sustainability	5
4. Anchoring and Guidelines	6
5. Identification and Prioritization of Risk.....	7
6. Ceasing, Prevent or Mitigating Adverse Impacts	8
7. Cooperate in Remediation	9
8. Reporting channel	9
9. Right to Request Information.....	10
10. Analysis Report.....	10
a. Introduction.....	10
b. Methodology and Supplier Engagement	10
c. Risk Assessment Findings	11
i. Human Rights	11
ii. Working Conditions.....	12
iii. Geographic Risks	12
iv. Combined High-Risk Suppliers	13
v. Positive Findings.....	13
vi. Actions Taken	13
vii. Planned Measures.....	13
viii. Conclusion	14

1. Background

This is Survitec Group Norway (SGN) AS's Norwegian Transparency Statement (the "Statement") in accordance with the Norwegian Transparency Act 2022 ("the Act"). This Statement has been prepared in line with the requirements of the Act relating to enterprises' transparency and work on human rights and decent working conditions.

In accordance with Section 5 of the Transparency Act, businesses must publish a report on the due diligence assessments that have been carried out. The purpose of this report is to provide the public with insight into the business's work on due diligence assessments, key findings that have been uncovered, and what measures have been implement

2. Organization of business and operating area

The registered office of Survitec Group Norway AS (SGN) is part of Survitec Group Ltd., which is headquartered in the UK and operates globally. The ultimate holding company of SGN is Ark Topco Limited.

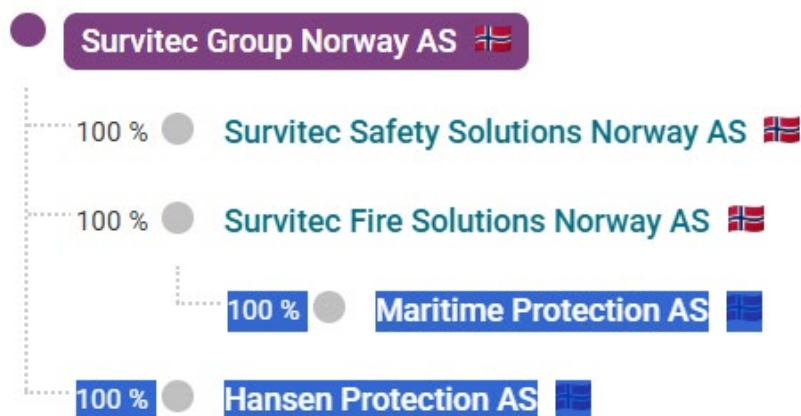


Figure 1 Organisation of business Survitec Group Norway AS

NB: Maritime Protection AS and Hansen Protection AS (Highlighted in Blue) maintain their own supplier qualification and control processes and will therefore provide separate evaluations independent of this assessment. Reference Brønnøysundregisteret.no/Proff.no.

Survitec Group Norway AS (Org. No: 912 237 788) is the holding company based in Oslo, while Survitec Safety Solutions Norway AS (Org. No.: 916 068 530) and Survitec Fire Solutions Norway AS (Org. No: 992 568 356) is run from the head office in Gangstøvika in Ålesund.

SGN has service stations located in Ålesund and Stokmarknes and sales office in Oslo. The companies are wholly owned by Survitec Group Norway AS and is part of Survitec Group Limited (registered in London, UK). The company conducts trading activities related to maritime safety and rescue equipment. This includes sale, assembly, and service of said equipment.

Survitec Group is a pioneer within Survival Technology. The Group's wearable survival equipment, fire solutions and survival craft technology keep people safe when their life depends on it. With presence in 96 countries, 3 000 employees, 700 trained Service Technicians, 11 manufacturing facilities and 400+ accredited service stations, the Group work on providing trustworthy solutions that reduce risk and help protect lives. The company

conducts trading activities related to maritime safety and rescue equipment. This includes sale, assembly, and service of said equipment.

SGN operations require a wide variety of goods and services. Our supply chain includes purchase of equipment and parts to produce and perform service on our products. The distribution, installation and commissioning of our products generally require technical and professional skills and use of capital-intensive labour.

The majority of the goods and services are the same as for other service stations within Survitec Group. The spare parts for the rescue systems are mainly sourced through Survitec Group's internal suppliers and/or locally in Norway. Our main internal suppliers are Survitec Group in Dunmurry, Northern Ireland, and DSB (Deutsche Schlauchboot GmbH) in Germany. In addition, SSSN use local Norwegian suppliers mainly for services, such as third party transportation and crane support. Examples such as Bring, DHL and locally in Ålesund, newly audited ACO Transport AS. This in addition to PPE, consumables and general facility service providers.

3. Sustainability

Environmental, social and governance have been long embedded in Survitec through various pioneering initiatives. Survitec proactively work with multiple stakeholders across the business to improve our processes and procedures to ensure transparent reporting. Our initiatives focus on transparent governance and our commitment to the world we live in through a fairer society, a healthier planet and a more sustainable business. Our ESG commitments and objectives are as followed:

ESG Objectives

- Ensure that we are in line with regulatory requirements and, where possible exceed the legal threshold for mandatory action
- Implement relevant ESG measures globally
- Ensure actions to reduce global footprint are initiated and implemented
- Enhance control over the supply chain

ESG Commitments

- Increase in the use of renewable energy globally by 2030
- Increase the completion rates of our colleagues engagement survey
- GhG reduction by 2030 and 2050
- Targeting management diversity

- Increase the number of community engagements

Please request our ESG report for comprehensive information on our Environmental, Sustainability, and Governance (ESG) initiatives.

4. Anchoring and Guidelines

Survitec group has designed governance documents, guidelines and procedures with the aim of taking comprehensive sustainability responsibility. This also includes human rights and decent working conditions. The governance documents and guidelines help to clarify responsibilities and expectations for ourselves and our partners as well as other stakeholders. We have aligned our approach with the UN Guiding Principles on Business and Human Rights (“UNGPs”) and the OECD Guidelines for Multinational Enterprises and their guidance on Human Rights Due Diligence (“HRDD”). We have embedded the protection of human rights into our governance structures, as well as seeking to ensure accountability through our policies, training and management systems. In 2023 Survitec Group Ltd. published their Human Rights Policy with full support from the Group’s Board and Executive Team.

Building our capacity to understand human rights and modern slavery challenges is key to our human rights strategy. We have inhouse training on human rights and modern slavery which is rolled out to all employees. All employees are provided with mandatory training on our Code of Business Conduct and Ethics which includes information on human rights and how to report concerns. These trainings also have refreshers every 12-18 months.

We will continually review and develop our policies as we gather more insight into risks and from the input from inhouse experts, suppliers and external stakeholders. Key documents in connection with due diligence assessments and the Transparency Act are:

- [Code of Business Conduct and Ethics](#) – Survitec Group is committed to conduct its business with honesty, integrity, professionalism, and in compliance with relevant laws wherever it operates. All staff are expected to maintain high standards in line with the Survitec policies and procedures. The Survitec Group Code of Business Conduct and Ethics applies to all of our employees, complementary workers and third parties. It sets out the clear expectation of the Group and explains the principles that underpin its ethical standards. It includes human right requirements and provides examples of human rights issues such as forced labour.
- [Supplier Code Conduct](#) -The Supplier Code of Conduct builds on the commitments in the Code of Business Conduct and Ethics and addresses new workforce issues including but not limited to
 - slavery, human trafficking and child labour
 - human rights

- equal opportunities
- freedom of association and collective bargaining
- working environment
- working hours
- wages and remuneration
- environmental responsibility

The Supplier Code of Conduct includes prescribed standards such as those of the International Labour Organisation. All direct material suppliers and key service providers are required to sign the Code of Business Conduct and Ethics and supply supporting evidence of their compliance on request. Such compliance may be monitored as part of the supplier's audit.

- c. **Human Rights Policy** – The Group's Human Rights Policy outlines its commitment to respect and support human rights wherever it does business. It specifically outlines the Group's expectation that employment is freely chosen.
- d. **Modern Slavery Policy** - This Policy concerns compliance with laws and regulations which prohibit modern slavery in all its forms, and which are enforced by various jurisdictions around the world. Survitec Group has a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships, and to implement and improve effective systems, controls and practices to ensure modern slavery is not taking place in our supply chains. We make certain that everyone is treated fairly, honestly and respectfully, and we expect the same standards from all our contractors, suppliers, third parties and other business partners. This results in our Modern Slavery Act.
- e. **Whistleblowing Policy** - This Policy will reassure anyone wishing to make a report that they may do so without fear of victimisation, retaliation, harassment or discipline. This Policy will also reassure anyone against whom a report is made that the details and their identity will be kept confidential until such time as it may be appropriate for such details to be disclosed.
- f. **Working with Responsible Third Parties** – Our Retention of Third-Party Intermediaries Policy, Customer Onboarding Protocol and Supplier Code of Conduct outline our expectations of the standards we expect suppliers and third parties to meet, including, but not limited to, human rights issues such as forced labour and child labour.

5. Identification and Prioritization of Risk

We take a global approach to identifying and assessing human rights impacts and risks. We believe our exposure to the risk of impact of human rights increases when we

engage with third parties. To identify and assess the risk of human rights violations across our own operations, supply chains and business relationships, we undertake the following steps:

- a. **Supplier and Third-Party Onboarding and Screening** – all suppliers and third parties are screened before any business takes place. For higher risk jurisdictions, site visits are conducted by the Supply Chain team. Each supplier who does business with Survitec must sign the Survitec Supplier Code of Conduct which confirms the supplier will uphold certain prescribed standards concerning human rights, labour, health and safety, environmental, and business ethics practices in order to ensure transparency as far as practicable. The Group has a daily batch screening tool in place for all of its third parties, monitored by the Compliance Team.
- b. **Regular Risk Management** – this happens at all sites across the Group and includes Environmental, Health & Safety audits, Quality audits and Product Safety audits. Our Third-Party Process includes risk assessment and due diligence to identify labour rights risks when engaging new suppliers and third parties.
- c. **In-depth Due Diligence for High-Risk Activity** – the Group has enhanced levels of due diligence in place for high-risk jurisdictions and third parties, updated regularly in line with sanctions, laws and trade controls. These enhanced screening processes align with OECD Due Diligence Guidance for Responsible Business Conduct which recommends businesses carry out iterative and increasingly in-depth assessment of prioritised operations, suppliers and other business relationships in order to identify and assess specific actual and potential adverse impacts. We also use the UN Guiding Principles on Business and Human Rights guidance to prioritise the most significant risks.

6. Ceasing, Prevent or Mitigating Adverse Impacts

The OECD Due Diligence Guidance for Responsible Business Conduct outlines that businesses should stop activities that are causing or contributing to adverse impacts and develop and implement plans to prevent and mitigate potential future adverse impacts. Survitec Group seeks to work with suppliers to address identified issues and support their improvements. If a supplier refuses to address significant issues or if criminal activity is identified, Survitec Group may withdraw our business and/or contact and assist relevant law enforcement authorities.

A wide range of policies, procedures and processes are in place to make Survitec Group as transparent as possible. It is important that we are compliant to and follow all our policies and make it part of our day-to-day life. Therefore, every employee need go through online compliance training frequently. Together with the People and Culture Team, the Compliance Team is responsible for cascading knowledge on human rights and modern slavery across Group functions and Business Units. This includes mandatory online training on different

topics of Compliance with refreshers every 12-18 months. As an example, all employees had to go through a refresher training on Modern Slavery in 2023. Survitec Group is also in line with the ILO Conventions relating to Labour Rights, including Forced Labour and Child Labour.

The measures taken to uncover actual violations of working conditions and human rights in the supply chain through questionnaires, audits and inspections are expected to primarily identify cases where improvements are required. At the same time, it is also expected that this will have a certain preventive effect, through supply chain actors improving their systems. The work that is done to follow up on potential deviations and the dialogue work related to the deviations is done with a view to contributing to actual improvement of working conditions.

7. Cooperate in Remediation

If we receive a concern we apply our investigative principles of humanity, confidentiality, proportionality and safeguarding to the matter raised. The concern will be looked at by individuals in the Survitec Group Legal and HR teams and, if appropriate, a formal investigation will take place. Once we have established the facts, we ensure that the concern is addressed in the appropriate way. At the end of the process, we give feedback to the person who reported the concern, even if we are unable to share the outcome in detail. Survitec Group has a Whistleblower Policy in place to ensure no retaliation against any individuals who reports a concern in good faith.

8. Reporting channel

Survitec Group endeavours to communicate its work on human rights in the following ways:

- a. Legislative reporting requirements such as our Modern Slavery Act, our policies and procedures and this Norwegian Transparency Act.
- b. Information on our website, in our wider ESG communications and in our statutory reporting.
- c. **Survitec Hotline** - Our grievance mechanism is called the Survitec Hotline and is available to all Survitec Group employees, contractors, suppliers, workers in our supply chain and all other third parties. Anyone who sees anything not in line with our policies and procedures or has any concerns can make a report, confidentially if they wish. We also expect suppliers who we work with to provide a grievance mechanism for workers to raise occupational concerns. Concerns can be reported via telephone, web portal or email. These channels are managed independently of Survitec Group and are available globally in

multiple languages. Links for these channels can be found via our Code of Business Conduct and Ethics, which is publicly available on our website .

9. Right to Request Information

Any third party can contact Survitec Group to request information regarding how we address actual and potential adverse impacts on human rights and decent working conditions. These requests can be sent to compliance.support@survitecgroup.com or info@survitecgroup.com.

10. Analysis Report

a. Introduction

The findings are based on the assessment of 127 suppliers across 25 countries, with a focus on identifying, assessing, and mitigating risks associated with human rights violations and poor working conditions.

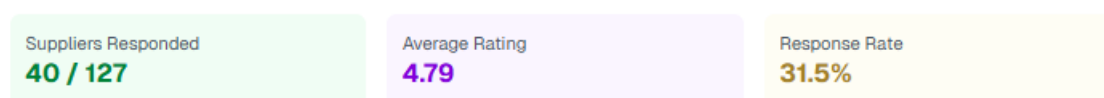


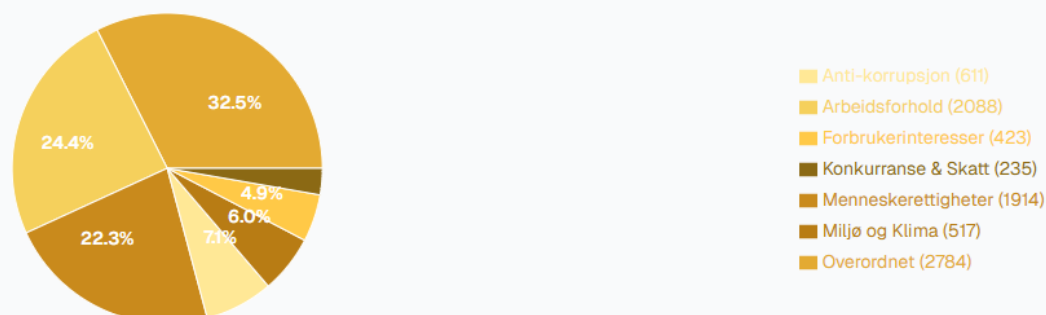
Figure 2 Responses Timeline

b. Methodology and Supplier Engagement

The company engaged with 127 suppliers in total, conducting structured assessments based on a standardized questionnaire covering seven core categories: General (Overordnet), Working Conditions (Arbeidsforhold), Human Rights (Menneskerettigheter), Anti-Corruption, Environment and Climate, Consumer Interests, and Competition & Tax. As of the reporting period, 28 suppliers have fully completed the assessment, representing 22% of the total supplier base.

Supplier engagement was prioritized based on country risk, category of supplied goods and services, and the supplier's role in the company's value chain. The largest supplier group is based in Norway (23 suppliers), followed by Sweden (6), Germany (5), and the United Kingdom (5). Other countries with supplier presence include China, Italy, Lithuania, Poland, Denmark, and several others.

Top 10 Categories



All Categories

#	CATEGORY NAME	QUESTIONS	PERCENTAGE
1	Overordnet	2784	32.48%
2	Arbeidsforhold	2088	24.36%
3	Menneskerettigheter	1914	22.33%
4	Anti-korrupsjon	611	7.13%
5	Miljø og Klima	517	6.03%
6	Forbrukerinteresser	423	4.93%
7	Konkurranse & Skatt	235	2.74%

Figure 3 Category Distribution- Top 10 Categories

c. Risk Assessment Findings

i. Human Rights

The human rights category accounted for 22.33% of all assessment questions (1,914 out of 8,572). The focus was on identifying forced labor, discrimination, child labor, and freedom of association risks. While the majority of suppliers operate in countries with robust legal frameworks, suppliers from certain countries such as China and Mexico were identified as operating in higher-risk jurisdictions for human rights violations.

ii. Working Conditions

Questions related to working conditions represented 24.36% of the assessment (2,088 questions). The evaluation emphasized occupational health and safety, fair wages, and working hours. Overall, suppliers in Norway, Germany, and Sweden demonstrated strong compliance, while suppliers in countries with less regulatory oversight required further investigation.

iii. Geographic Risks

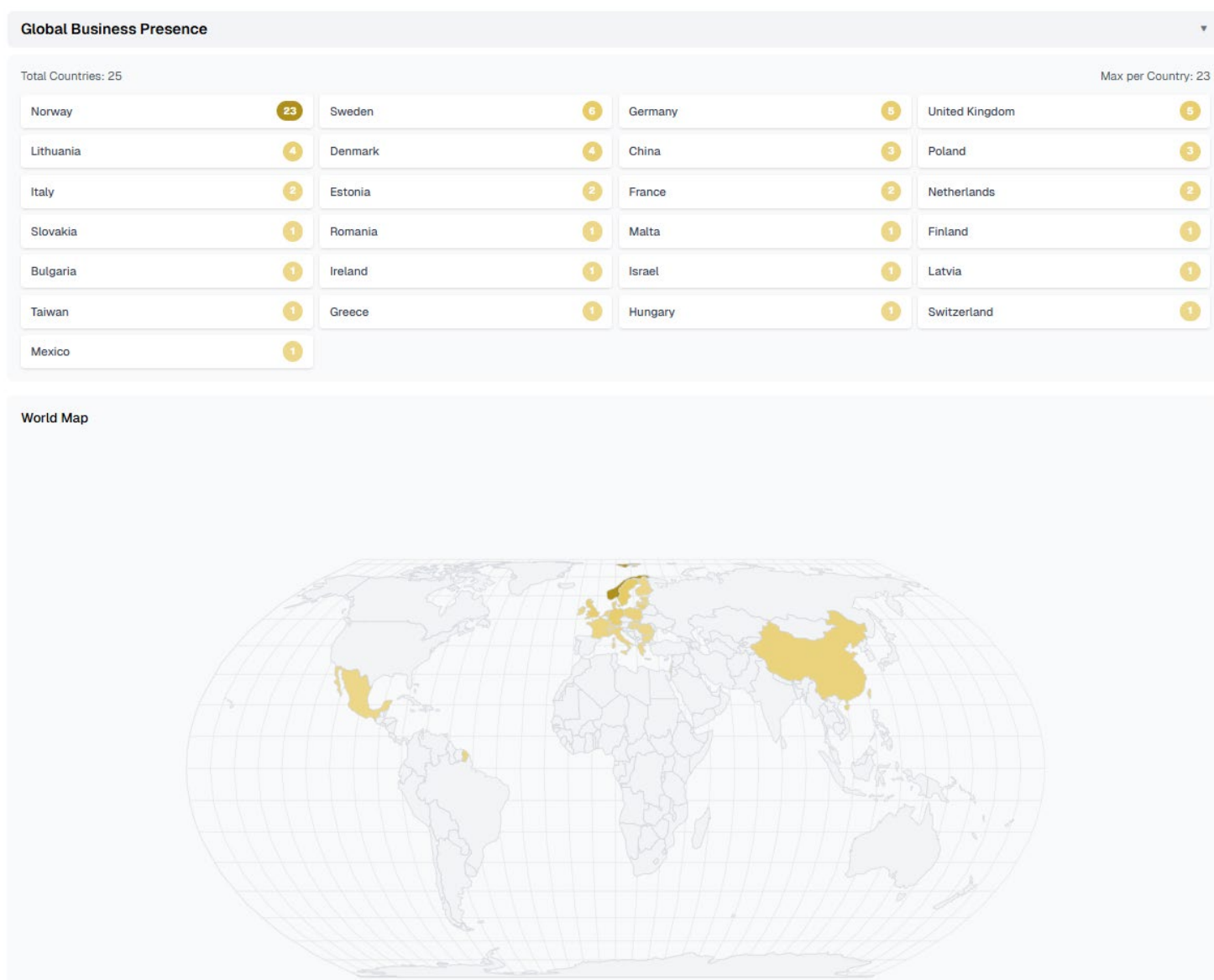


Figure 4 Global Business Presence

Survitec

Survitec Group Norway AS
Email: Norway.sales@survitecgroup.com / survitecgroup.com

VAT Number: 912 237 788
Registered In: Norway
Company Registered Number: 912 237 788

The supplier base spans 25 countries. The highest concentration is in Norway (23 suppliers), a low-risk country for both human rights and working conditions. However, suppliers in China (3 suppliers), Mexico (1 supplier), and certain Eastern European countries (e.g., Romania, Bulgaria, Lithuania, Poland) present elevated risk profiles due to regional human rights and labor concerns.

iv. Combined High-Risk Suppliers

Suppliers operating in China and Mexico were flagged for combined risks related to both human rights and working conditions. Due to confidentiality and legal constraints, specific company names are withheld in this public report.

v. Positive Findings

- 31,5% of suppliers have fully completed and returned the due diligence questionnaire, demonstrating engagement and transparency.
- Suppliers based in Norway, Germany, Sweden, and the United Kingdom generally show strong adherence to human rights and labor standards.
- The majority of assessed suppliers are located in jurisdictions with established legal protections for workers and human rights.

vi. Actions Taken

- Risk-based prioritization of supplier assessments, focusing on suppliers in high-risk countries and sectors.
- Direct engagement with suppliers to clarify responses and request further documentation where needed.
- Enhanced monitoring of suppliers flagged for elevated risk, especially those operating in China, Mexico, and selected Eastern European countries.

vii. Planned Measures

- Increase the completion rate of supplier assessments, with a target of 50% participation in the next reporting cycle.
- Implement follow-up audits for suppliers identified as high-risk to verify self-reported information.
- Provide targeted training and capacity-building resources to suppliers in higher-risk regions.

- Regularly update the risk assessment methodology to reflect changes in the geopolitical landscape and regulatory requirements.

viii. Conclusion

The company has established a systematic process for mapping and assessing human rights and working conditions risks within its supply chain, in accordance with the requirements of the Transparency Act. While the majority of suppliers demonstrate compliance with international standards, ongoing efforts are needed to address gaps among suppliers in higher-risk countries. The company remains committed to continuous improvement, transparent reporting, and effective risk mitigation in collaboration with its suppliers.