

## Survitec Safety Solutions Norway AS Transparency Act Statement 2024

### Introduction

This is Survitec Safety Solutions Norway AS's ("SSSN") 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.

The registered office of SSSN is Gangstøvikvegen 66 in Ålesund, Norway. It is part of Survitec Group Ltd., which is headquartered in the UK and operates globally. The ultimate holding company of SSSN is Ark Topco Limited.

To make sure we are committed to respecting human rights and decent working conditions, Survitec Group has policies, processes and procedures that cover both our own operations and those of our suppliers and third parties.

This Statement has been approved by the Chairman of the Board and Managing Director of SSSN.

Ålesund, 24.06.2024



**Jan Eskil Hollen**  
Chairman of the Board/Managing Director  
Survitec Safety Solutions Norway AS  
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### Survitec

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## Organisation, Structure & Operations

SSSN is run from the head office in Gangstøvika in Ålesund and has service stations located in Bergen and Stokmarknes and sales office in Oslo. The company is 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.

### ● Survitec Group Limited



## Supply Chain

SSSN's 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 crange 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.

## Human Rights Due Diligence

As part of forming our broader efforts to run a responsible business is our due diligence approach to managing the risk of human right abuse. We have aligned our approach with the UN Guiding Principles on Business and Human Rights ("UNGPs") and the OECD Guidelines for

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Multinational Enterprises and their guidance on Human Rights Due Diligence (“HRDD”). How we meet the 6 steps of HRDD is outlined below.

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.

#### 1. Embedding responsible business conduct into policies and management systems

The OECD Due Diligence Guidance for Responsible Business Conduct recommends that businesses devise, adopt and disseminate a combination of policies. We have several group-wide policies in place that are relevant to human rights and decent working conditions. 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.

**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.

**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.

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**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](#).

**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.

**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.

**Survitec Hotline** – we encourage anyone, whether working for Survitec Group or not, to speak up about misconduct, possible breaches of our Code of Business Conduct and Ethics, other Group policies or procedures and suspected violations of laws and regulations. To enable this, we provide a Survitec Hotline that is provided by an independent third party and is multilingual. More information and access to the Survitec Hotline can be found in the Survitec Code of Business Conduct and Ethics.

**Training** – 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.

## 2. Identifying and Assessing Adverse Impacts

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:

**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.

**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.

**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.

### 3. 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.

### 4. Track Implementation and Results

As part of our human rights strategy, we have developed the following key actions:

- Build our capacity to understand human right risks.
- Strengthen our due diligence processes to identify human right impacts.

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## 5. Communicate how Impacts are Addressed

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

- Legislative reporting requirements such as our Modern Slavery Act, our policies and procedures and this Norwegian Transparency Act.
- Information on our website, in our wider ESG communications and in our statutory reporting.

## 6. Provide for or Cooperate in Remediation when Appropriate

The OECD Due Diligence Guidance for Responsible Business Conduct recommends that businesses establish operational level grievance mechanisms.

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 – [www.survitecgroup.com](http://www.survitecgroup.com).

When 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.

### 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](mailto:compliance.support@survitecgroup.com) or [info@survitecgroup.com](mailto:info@survitecgroup.com).