

Survitec Safety Solutions Norway AS Transparency Act Statement 2023

Introduction

This is Survitec Safety Solutions Norway AS's ("SSSN") first 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, Ålesund, Norway. It is part of the Survitec Group of companies, which is headquartered in the UK and operates globally. The ultimate holding company of SSSN is Ark Topco Limited.

Globally Survitec Group has policies and processes in place relating to human rights 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.



Jan Eskil Hollen
Chairman of the Board
Survitec Safety Solutions Norway AS

SSSN Overview, Structure and Supply Chains

The company conducts trading activities, including the sale, assembly and service of maritime rescue and safety equipment, as well as activities related to this. The business is run from the head office in Gangstøvika in Ålesund and has service stations in Bergen and Stokmarknes and sales offices in Oslo and Rosendal.

The company is wholly owned by Survitec Group Norway AS and is part of the Survitec Group of companies. Supply Chain comes mainly from internal Survitec suppliers such as Survitec Group in Dunmurry, Northern Ireland and DSB Deutsche Schlauchboot GmbH in Germany. In addition SSSN uses local Norwegian suppliers for spare parts for our products under the Brude range (which was formerly an independent company until 2015).

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Survitec Group is a pioneer of Survival Technology. The Group's wearable survival equipment, fire solutions and survival craft technology keep people safe when their life depends on it. The Group has 3,000 employees who work with its partners in 96 countries to provide trustworthy solutions that reduce risk and help protect lives.

SSSN's operations require a wide variety of goods and services to operate, the majority of which are the same as used at other service sites within Survitec Group. The OEM parts for the Brude products are sourced through Survitec Group's internal suppliers and locally in Norway.

Our supply chain includes purchasing equipment/parts to produce and perform services on our products. The distribution, installation and commissioning of our products generally require technical and professional skills and use of capital-intensive labour. This is again related to the Brude MES range.

Goods and services to support our operations are purchased from third parties located in Norway as well as from other countries.

Our operations also require third party marine transportation services via ocean-going cargo vessels or land-based transport.

Implementing Human Rights Due Diligence

Our due diligence approach to managing the risk of human rights abuses forms part of our broader efforts to run a responsible business. We have aligned our approach with the UN Guiding Principles on Business and Human Rights ("UNGPs") and OECD Guidelines for 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 human rights protections into our governance structures, as well as seeking to ensure accountability through our policies, training and management systems. The OECD Due Diligence Guidance for Responsible Business Conduct recommends that businesses embed policies and human rights into a business's oversight bodies. In 2023 Survitec published its Human Rights Policy with full support from the Group's Board and Executive Teams. Training on human rights has long been carried out by the Group's Compliance Team who are responsible for cascading knowledge on human rights and modern slavery across Group functions and Business Units.

Policies

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 the input from inhouse experts, suppliers and external stakeholders.

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Code of Conduct – The Survitec Group Code of Business Conduct and Ethics applies to all of our employees, complementary workers and third parties. It helps the Group shape the decisions it has to make and the actions it chooses to take. It sets out the clear expectation of the Group and explains the principles that underpin its ethical standards. It includes human rights requirements and provides examples of human rights issues such as forced labour.

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.

Working with Responsible Third Parties – our Retention of Third Parties Policy and Supplier Onboarding Policy outline our expectations of the standards we expect suppliers and third parties to meet, this includes regarding 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 Conduct or other Group policies or procedures and suspected violations of laws and regulations and we provide a Survitec Hotline to enable this. Our Hotline 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 Conduct.

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 employees. All employees are provided with mandatory training on our Code of Conduct which includes information on human rights and how to report concerns.

Assessment of Adverse Impacts

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

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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.

Cease, Prevent or Mitigate 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 and may withdraw our business if a supplier refuses to address significant issues.

Track Implementation and Results

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

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

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 Statement, our policies and procedures and this Norwegian Transparency Act Statement
- Information on our website, in our wider ESG communications and in our statutory reporting

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 to sees anything not in line with our policies and

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procedures or has a concern 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 Conduct, which is publicly available on our website – 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 individual who reports a concern in good faith.

Right to Request Information

Any third party can contact Survitec Group to request information regarding how is addresses 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