

Bukser og Berging AS - Reporting under the Norwegian Transparency Act

The Norwegian Transparency Act (NTA) entered into force on July 1 2022. The intent of the Act is

- i. to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services, and
- ii. to ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

The reporting requires

- A general description of the enterprise's organization and area of operation.
- Guidelines and routines for handling actual and potentially negative consequences for fundamental human rights and decent working conditions.
- Information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence.
- Information regarding measures the enterprise has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures.

Our reporting related to the NTA is based on the UN Guiding Principles on Business and Human Rights and the OECD model for Due Diligence for Responsible Business Conduct. To make an enquiry under the NTA, please contact nta@bube.no.

About Buksér og Berging

Bukser og Berging and subsidiaries ('BB or 'the Company') provides a range of marine services stemming from long-standing experience within port towage and marine contracting. BB owns and operates a fleet of purpose-built vessels registered with the Norwegian ordinary ship register (NOR), providing services mainly in Norwegian waters but also in foreign waters in the North Sea. All seagoing personnel, abt 430 in total, are employed with BB on collective union agreements.

The Company's headquarter is in Bærum which also is the principal operational base supporting branch offices in Stavanger and Fedje, and subsidiaries in Sweden. The main services are outlined below.

Harbour Towage and Ship Escort

BB offer a range of tugs along the Scandinavian coasts to ensure ships' safe arrivals and departures. Ship escort is included in the service to ensure safe passage of dangerous cargo to and from terminals.

Offshore Support and Marine Contracting

BB provide marine service involving engineering and operational planning. Typical contracts include; tow-outs and offshore positioning, deck mating and load inn/out operations, mooring and anchor handling, installation of wind turbines and offshore structures.

Sea Transport of Norwegian Pilots and Ambulance Services

BB provide high speed craft services along the Norwegian coast ensuring safe transport and embarking/disembarking of pilots to/from ships calling Norwegian ports. Further, BB serves the

Western Norway Regional Health Authority with transportation of patients and paramedics by ambulance boat.

Fish Farming Support

BB offers effective and sustainable mechanical delousing of farmed salmon and trout.

BBs Guidelines and routines for handling Human Rights Due Diligence

BB recognize the responsibility to minimize the adverse impact of our operations, supply chains and other business relationships. Therefore, responsible business conduct is embedded in our management systems.

Policies & Procedures

The Company has established policies and procedures, which set out how we manage issues related to human rights and decent working conditions. This covers both our own organization and parties we do business with and in particular, our supply chain.

- Code of Conduct
- Health, Safety & Quality Policy
- Human Rights Policy
- Environmental Policy

The Code of Conduct covers support and respect for the protection of internationally proclaimed human rights, labor rights, rights to freedom of association and non-discrimination. We also respect and promote the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the International Maritime Organization's Maritime Labor Convention.

All policies and procedures are available for the employees in the BB Unisea Management System. Our policies are reviewed and updated as necessary in the annual management reviews.

BB aim to carry out the business in a way that supports and respects the protection of international proclaimed human rights. We do not engage in or support the use of child labor and support the elimination of all forms of forced labor, as outlined in our Code of Conduct.

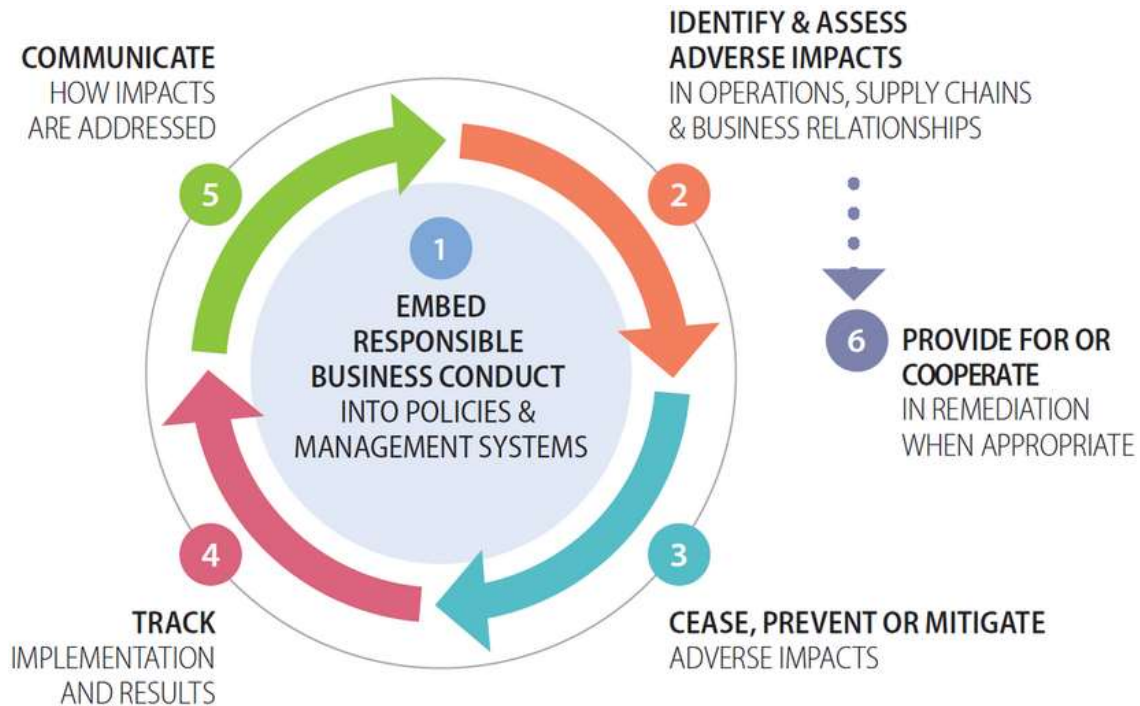
We ensure that all our employees are working under conditions that meet the requirements set out in the International Labor Conventions and the Maritime Labor Conventions. Freedom of association and right to collective bargaining is respected and implemented. BB do not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation or political affiliation.

BB purchases goods and services mainly from Norwegian suppliers and we prefer to source locally and to develop long term supplier relationships. We intend to develop a new 'BB supplier code of conduct' incorporating anti-corruption, human rights, labor conditions and environmental issues, to be included in our standard terms & conditions attached to all requests and purchase orders.

BB has developed a supplier assessment methodology for evaluation of new and existing suppliers and subcontractors. In addition to assessing competence and capabilities, the interview guide includes questions and information requests on areas like human rights, code of conduct, environmental issues and labour conditions. Further, BB aim to develop a self-assessment form for new suppliers which will incorporate questions on human rights, labour conditions etc.

Due Diligence Process

In accordance with the requirements of the Norwegian Transparency Act, BB has performed a due diligence process to identify, prevent or mitigate the Company's risk for, and actual negative impact on, basic human rights and decent working conditions including in the supply chain and through our business relations. The procedure is based on the six steps of the UN Guiding Principles on Business and Human Rights and the OECD model for Due Diligence for Responsible Business Conduct.



Our mapping of BB suppliers, subcontractors and business partners revealed the following common characteristics:

- Long term relationships
- Frequent and open communication
- Mainly Norwegian based companies

In identifying risks of actual and potential adverse impacts associated with the supply chain and business partner, we based our risk assessment on the following key parameters:

- Type of product or service
- Country and business environment of supplier
- Contract size and duration

For risk areas identified we evaluated severity, likelihood and measures to reduce or prevent risk.

The findings are summarized the table below.

	Shipyards	Ship Recycling	Supplies of equipment/parts
Area/activity	<ul style="list-style-type: none"> • Construction of new vessels • Repairs and dry dockings of BB vessels 	<ul style="list-style-type: none"> • BB vessels sold for scrapping/demolition 	<ul style="list-style-type: none"> • Purchase of equipment and parts for the vessels
Description of risk	<ul style="list-style-type: none"> • Risk related to labour rights and HSEQ in yards and the whole value chain • Involves often many sub(-sub)-contractors • The complexity of the projects makes it difficult to get a full overview of the whole value chain and companies involved 	<ul style="list-style-type: none"> • Risk related to labour rights and HSEQ in recycling sites • Work involves high degree of manual labor, often performed by unskilled workers 	<ul style="list-style-type: none"> • Our supplier is often European (Voith, Wärtsilä, etc) but the actual production of equipment and parts may occur in areas/countries traditionally known for incidents of breach on fundamental human rights in the supply chain
Potential negative effect	<ul style="list-style-type: none"> • Health and safety • Freedom of association and collective bargaining • Modern slavery and exploitation of migrant workers • Working hours • Remuneration and wages • Corruption 	<ul style="list-style-type: none"> • Health and safety • Freedom of association and collective bargaining • Modern slavery and exploitation of migrant workers • Working hours • Remuneration and wages 	<ul style="list-style-type: none"> • Poor or dangerous working condition • Child labor • Freedom of association and collective bargaining • Remuneration and wages
Evaluation of risk	<ul style="list-style-type: none"> • Medium risk • Medium opportunity to influence 	<ul style="list-style-type: none"> • Medium risk • High opportunity to influence 	<ul style="list-style-type: none"> • Medium risk • Limited opportunity to influence
Identified adverse impacts	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • none
Measures to reduce/prevent risk	<ul style="list-style-type: none"> • BB mainly use Nordic yards for repairs and dry dockings. • BB Supplier assessment and audits • Contractual obligations to comply with HSEQ and Human rights requirements • BB on -site technical superintendents monitors the work and have direct involvement/communication with yard's subcontractors 	<ul style="list-style-type: none"> • BB only use ship recycling sites approved by EU or licenced by the Norwegian County Governor ("Statsforvalter") based on the Pollution Control Act • BB Supplier assessment and audits • Contractual obligations to comply with HSEQ and Human rights requirements 	<ul style="list-style-type: none"> • BB only source spares from maker or reputable (maker) approved suppliers • Introduction of BB self-assessment form • BB Supplier assessment and audits