

02.01.2025

Statement on the Transparency Act

The Transparency Act came into effect on July 1, 2022. The main purpose of the law is to promote business respect for fundamental human rights and decent working conditions. The law also ensures that the public has access to information about how businesses handle their human rights risks.

The Transparency Act obliges us to:

- Conduct due diligence assessments in accordance with the OECD Guidelines for Multinational Enterprises,
- Account for our work with due diligence assessments related to human rights and decent working conditions, and
- Respond to information requests.

Since the enactment of the law, we have primarily focused on embedding and identifying risks of negative impacts on human rights and decent working conditions both within our company and in our supply chain.

This statement describes our guidelines and procedures for managing risks related to human rights and decent working conditions, the significant risks we have identified, and the measures we have implemented as a result of our identified risk areas.

About Us

Level Offshore AS's core business is staffing and recruitment within the offshore sector. We aim to be positively different and strive to achieve something valuable for companies, leaders, and employees.

Through our services, we strive daily to contribute positively to decent working conditions. Through our sustainability efforts and analyses, we have identified that our positive externalities include creating jobs, providing opportunities to those outside society, promoting diversity, equality, and safe workplaces.

The market is primarily offshore, both in Norway and worldwide. We have employees both in Norway and abroad. Our headquarters is located at Industrigata 25, 5537 Haugesund, and in addition to our leased candidates, we have an administration team of 12 people in the office.

How We Work with the Transparency Act

We are committed to acting responsibly and ensuring respect for fundamental human rights and labor rights. This commitment is included in our Policy on Human Rights and Decent Working Conditions. In our policies and guidelines, we commit to conducting due diligence assessments. The general manager is responsible for following up on these commitments and reports to the board at least annually.

We also have other guidelines that emphasize our views on human rights and decent working conditions. This includes the Employee Handbook, Ethical Guidelines, Policy on Equality and Diversity, Policy on Equality, Sustainability Strategy, various HSE policies, procurement policy, and privacy policy.

We have the following procedures for managing our human rights risk:

- Ethical Guidelines
- Hiring Procedures
- Salary Setting Procedures
- Employee Follow-up Procedures
- Deviation Handling Procedures
- Internal Control Procedures
- Whistleblowing Procedures

Risk Assessment

We have first conducted a risk mapping to identify the areas within our business, among our business partners, and in our supply chain where it is most likely that significant risks of actual or potential violations of human rights and labor rights occur.

Our main suppliers received a questionnaire asking how they work with human rights and labor rights. The responses received were satisfactory and revealed no specific risks related to human rights and labor rights.

In connection with the risk mapping, we have assessed typical industry risks, geographical risks, company-specific risks, and product/service risks. Based on the risk mapping, the following significant risk areas were identified:

- The right to a fair wage
- The right to a good working environment

- The right to data protection

We have not identified actual violations of human rights or decent working conditions. Based on the risk assessment, we have selected the following areas for potential violations of human rights and decent working conditions to prioritize in our work:

- Decent wages
- Good working environment
- Data protection
- Decent working conditions in the supply chain

1. Decent Wages

Wages in accordance with tariffs are considered decent wages. There may be a risk that leased employees receive lower wages than legally required (ref. the principle of equal treatment). We maintain good dialogue with our customers and candidates on this. We believe that these measures reduce the risk of the customer not paying decent wages and increase the risk of detection.

2. Good Working Environment

Everyone has the right to a good working environment. There may be a risk that leased employees have an environment that is not good enough, without our knowledge. We send out employee surveys via forms to our employees, allowing our leased employees a chance to report issues, including anonymously. We believe that these measures reduce the risk of us not detecting issues.

3. Data Protection

There may be a risk that personal data from our leased employees is compromised. We handle large amounts of personal data, including sensitive data. We have established procedures for handling personal data and any breaches of privacy laws. This includes, among other things, using a GDPR-secured system for storing personal data and having an internal procedure that details how we should store and process personal data. We believe that these measures reduce the risk of personal data being compromised.

4. Decent Working Conditions in the Supply Chain

Based on a risk assessment, our main suppliers were asked how they work with human rights and decent working conditions. This process gave us better insight. We will prioritize following up with suppliers who have not yet responded, as well as expanding the assessment to include more suppliers. We evaluate our suppliers according to ISO9001 and

will work to expand the evaluation to include questions about human rights and decent working conditions.

Summary and the Way Forward

We will follow up on the implementation and measures initiated as a result of the due diligence process described above. We have established an internal group to continuously follow up on this work. Due diligence assessments will be conducted at least annually, as well as when there are changes in the risk landscape.

Information requests should be directed to: Svein Erik Pedersen, General Manager Level Offshore AS, sep@leveloffshore.no

This statement is prepared in accordance with Section 5 of the Transparency Act. The statement applies for the period from January 1, 2025, to January 1, 2026.