

Statement under the Transparency Act 2023 for Ovun Holding AS and subsidiaries

1.0 Introduction

Ovun's vision is to transform the ocean into a safe, profitable and sustainable workplace.

Our values and ethical guidelines are the foundation for our work to safeguard human rights and promote good working conditions internally in our own operations and with our suppliers and business partners. This statement describes our work with this in connection with our production of goods and delivery of services.

1.1 Key information about the company

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| Company name: | Ovun Holding AS with subsidiary: Ovun AS Ovun Innlandet AS |
| Address headquarters: | Strandgata 108, 6300 Åndalsnes |
| Products: | Integrated plastic solutions/products for seismic, oil and gas, renewable offshore, seismic, aquaculture, watercourse safety, navigation and safety and other industries. Rotational moulding, polyurethane casting, foundry moulds, maritime electronics etc. |
| Description of organizational structure: | Ovun AS was established in 1992. Ovun AS has its head office and own production facilities in Åndalsnes, production facilities in Moelv and Molde, and an office in Oslo (Lysaker). The company is owned by Investinor Direkte AS (49%), Salvesen & Thams Invest AS (25%), Norsk Mineral AS (22.12%) and Oskar Sylte Invest AS (3.88%). Jan Møllerhaug is the company's chief executive officer (CEO). |

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|---|---|
| Revenue in the reporting year (2023): | 183,7 MNOK |
| Number of employees in the Group: | 60 |
| Significant organizational changes in 2023: | PartnerPlast AS changed its name to Ovun AS in August 2023. The subsidiary Molstad Modell og Form AS changed its name to Ovun Innlandet AS in August 2023 and was further merged into Ovun AS on 01.01.24. The operations of Partner Plast Inc. have in 2023 been run from Ovun AS. The company will be wound up in 2024." |
| Name, title of contact person for the report: | Kristine E. Mølmsaug, Quality and Sustainability Manager |
| Contact information for the contact person for the report: | kristine.molmsaug@ovun.com |

1.2 Information about own business

Production of our products takes place in our own factories and production facilities in Norway, including Åndalsnes, Moelv and Molde.

The company's management system is certified according to ISO 9001 and ISO 14001 and is an important tool for implementing policies and governing documents throughout our business and with our suppliers and business partners.

Sickness absence in the Group stood at 4.6% in 2023.

The company had 1 injury that resulted in absences from work in 2023. The absence lasted for 1 day and did not have long term effect.

The Group facilitates that employees with health challenges and any other needs can work in reduced positions.

Of the Group's 60 employees, 48 are men and 12 are women. The Group has 7 employees with part-time positions, of which 2 are men and 5 women. No one involuntarily works part-time. The Group has permanent on-call helpers who assist with, for example, illness, holiday periods and production peaks.

1.3 Supply chain information

Ovun strives for long-term supplier relationships with suppliers who demonstrate the willingness and ability to work with continuous improvement, who operate in accordance with internationally recognized principles of business ethics and treat workers with respect and dignity. The governing documents "Code of conduct", "Supplier guidelines" and "Supplier assessment" provide guidelines for us and our suppliers to both ensure responsible business practices and continuous improvement of the quality of raw materials and purchased components for our products.

Our suppliers of raw materials come mainly from Norway, Europe and the USA, while several suppliers have their subcontractors from Europe and Asia. See Table 1 for an overview of the most important input factors/raw materials for products or services and geography. In the reporting year, Ovun had commercial relationships with approximately 400 suppliers. More than 80% in value of our purchases in 2023 are from Norwegian suppliers/companies. The number of suppliers may vary throughout the year.

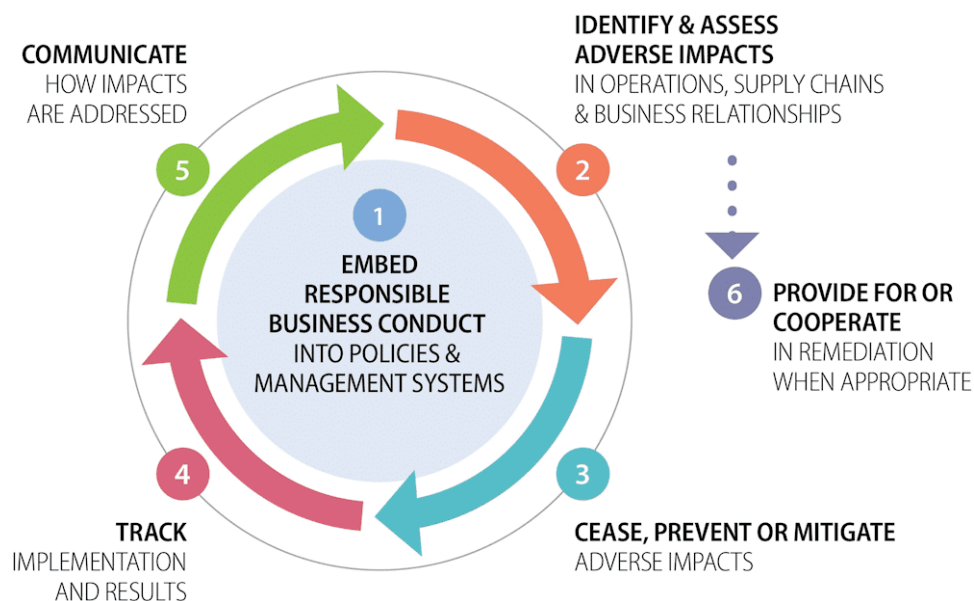
Table 1: Main input factors/raw materials for products or services and geography

| Factor inputs/raw materials | Country of manufacture* |
|--------------------------------------|--------------------------------|
| Polyethylene for rotational moulding | Belgium/Netherlands/Luxembourg |
| Polyurethane for casting | France and Germany |
| Polystyrene for filling | Norway |
| Isocyanate/Polyol | Denmark |
| Aluminium | Norway, Denmark, Germany |
| Steel products | Norway, Latvia |
| Chain | Norway, China |
| Batteries | Norway, Sweden |
| Electronics | Norway, Germany, China |
| Recycled polyethylene | Norway |
| Macro balls | Norway |
| Wax | Germany |
| Microglass | France |
| Agents | Australia, China |

* The list is not exhaustive and includes production countries from significant suppliers and suppliers' suppliers

2.0 Due Diligence

Ovun's due diligence system is based on the Transparency Act and the OECD due diligence model for responsible business conduct, shown in the following figure:



2.1 Anchoring and Accountability

Compliance with the Transparency Act and the OECD Guidelines for Fundamental Human Rights and Decent Working Conditions, as well as procedures and guidelines in the company's corporate governance are anchored in the company's management team and board. This includes, among other things, by:

- The ESG and sustainability action plan has been adopted and approved by the Board of Directors;
- Code of conduct;
- Company environmental, quality and HSE policies;
- Employee Handbook and Work Regulations; and
- Deviation and notification procedures.

Ovun has drawn up its own guidelines for suppliers. We will work to ensure that our suppliers and business associates have principles and procedures in place to actively prevent and deal with violations of fundamental human rights and decent working conditions.

2.2 Mapping and Assessment

2.2.1 Internal conditions

Internally in the business, organisational factors are mapped, such as demographics and diversity, and risk in production (working conditions/HSE). Risk in this context means processes, situations, equipment and undesirable incidents that may result in damage, loss of life, health, the environment or material assets.

Employees in our production work in an environment with risk factors such as rotating machines and demanding tools, moving equipment, heat, chemicals, lifting operations, etc. that require active HSE work and internal control with a focus on risk mapping, non-conformity follow-up, documented safety training, use of protective equipment and calibration and certification of equipment, etc.

Risk shall be systematically mapped and annual plans shall be drawn up on the basis of the risk assessments.

The company has its own procedure for whistleblowing and handling censurable conditions. Such as harassment and discrimination, bad culture, corruption or other financial crime, unacceptable working environment, breach of ethical guidelines, violation of law, etc.

2.2.2 Supplier relationships

The business has suppliers we trade with regularly and "mostly" know well, some less important suppliers, as well as one-off suppliers. In our supplier evaluation procedures, suppliers are categorized according to how important they are to us. A survey of suppliers has been completed during the reporting year, which together constitute approx. 90% of our purchases in value.

4 risk parameters in particular are important for selecting which suppliers we prioritize follow-up of. These parameters are:

- Geographical risk;
- Industry/sector risk;
- Product risks; and
- Own risk (criteria according to supplier evaluation procedure).

The underlying data is the company's supplier register. These are assessed against stipulated indices for the risk parameters above as described by the OECD, anskaffelser.no and BDO, among others. Furthermore, an overall assessment has been made in accordance with Ovun's risk matrix for due diligence to prioritize measures.

2.2.3 Double materiality assessment

In the autumn of 2022, Ovun, with assistance from EY, conducted a double materiality assessment within ESG, i.e. environmental, social and governance issues. In this connection, it looked at possible

negative consequences of the company's activities with regard to employees, working conditions, human rights, the environment, bribery, money laundering, customers and the company's governance, which can be related to the company's operations, supply chains, business contacts, and other stakeholders to the company.

The results of the mapping, together with systematic assessments in accordance with our management system procedures, have been used to prioritise our focus areas and measures in the Sustainability Action Plan 2024-2026, and form the basis for a long-term sustainability plan. The analysis will be updated in 2024 for any adjustments since 2022.

2.2.4 Risk areas

Based on our overall assessment of the various risk parameters mentioned in 2.2.2, approximately 15 of our 30 largest suppliers are assessed to be in the "medium" risk category according to Ovun's risk matrix for due diligence, while the remainder is set to low. The most important risk areas that have been identified and will be followed up with measures in 2024 are:

- The battery supply chain due to the production of batteries carries the risk of human rights violations at several stages of the supply chain (source: anskaffelser.no).
- Electronics supply chain due to raw material extraction risks, as well as processing and processing (source: anskaffelser.no)
- The metal supply chain due to the extraction and processing of metals carries a high risk of human rights violations (source: anskaffelser.no).
- Risk of exposure of chemicals with health and environmental hazards in own production.

2.3 Prevention - Follow-up and measures to reduce risk

We want to direct our efforts to where the risk to people, society and the environment is greatest. Dialogue, co-operation with, and clear requirements for our suppliers are among our most important tools towards this goal. We want to focus and adapt our follow-up to the possible negative consequences we have identified, rather than working in general and broadly towards "everyone". When we deem it necessary, we will also conduct audits.

2.3.1 Measures

Some of the measures we have carried out, or will continue to work on in 2024, are:

- In connection with major procurements and the use of new suppliers, due diligence of social conditions is carried out in advance;
- More thorough mapping and follow-up of supply chains within priority areas, including establishing a 3-year plan to evaluate our 20 largest suppliers every 3 years on environmental and social aspects/criteria;

- Continue to review our key suppliers' disclosures for their due diligence, sustainability reporting, and suppliers' actions to mitigate subcontractor risk;
- Follow-up of the sustainability strategic plan, and;
- Carry out and update substitution assessments of chemicals with health and environmental hazards used in own production.

2.4 Monitoring and Control

We will follow up and monitor that the measures implemented have the effect we want. This is a natural part of our work on continuous improvement, including evaluation of our own and suppliers' performance. We conduct internal audits, report in management meetings and to the board on overall measures and any non-conformities.

2.5 Communication

Under the Transparency Act, consumers and other stakeholders have a right to know how we deal with actual and potentially negative consequences uncovered in due diligence.

Enquiries can be sent to our Quality and Sustainability Manager.

2.6 Remedies

We have not identified or registered specific human rights violations related to our value chain during the reporting period, so nothing has required direct follow-up and correction of harm. We recognize that the complexity of the value chain can make it challenging to identify all deviations and breaches, and that this is something we must continue to work on continuous follow-up of.

3.0 Signature of the Board of Directors

The Board of Directors of Ovun Holding AS has received and read "*Statement under the Transparency Act 2023 for Ovun Holding AS and subsidiaries*".

Disclosure reporting year 2023

Ovun Holding AS with subsidiaries:

Ovun AS

Ovun Innlandet AS

Åndalsnes, 20.03.24

Names and roles of all board members:

| Name: | Role: |
|------------------------|-----------------------|
| Otto Sjøberg | Chairman |
| Jan Møllerhaug | Managing Director/CEO |
| Jan Erik Løvik | Director |
| Geir Arne Brønstad Rao | Director |
| Maja Aursand Andersen | Director |

The report is electronically signed.

