

## STATEMENT 2024 – THE TRANSPARENCY ACT

### 1 INTRODUCTION

This statement is Hesnes Holding AS and its subsidiaries Hesnes Shipping AS, Hesnes Invest AS, Attic Forrest AS, Norwegian Oil Trading AS, Hesnes Management Services AS, and Hesnes Insurance Brokers AS (the "**Hesnes Group**") report on the due diligence assessments pursuant to § 5 of Act relating to enterprises transparency and work on fundamental human rights and decent working conditions (the "**Transparency Act**")

The statement includes the due diligence assessments we have conducted for the period 1 January to 31 December 2023.

The statement is issued in English, ref. the Accounting Act § 3-4 (3).

In this statement the term "Hesnes Group" can refer to (as the context requires), the group as a whole, or an individual company in the Hesnes Group. The term "companies" are also used.

### 2 ORGANISATION AND AREA OF OPERATION

Hesnes Holding AS was founded on 18 December 2002 and is the parent company of the Hesnes Group, consisting of activities within car transportation brokering in international shipping, bunker brokering and trading, insurance brokering, shipowning as well as other investments mainly related to real estate and financial assets through the companies mentioned under section 1.

The Hesnes Group has a total of 25 employees working mainly from offices at Tenvik, Nøtterøy, and have in addition through the subsidiary Norwegian Oil Trading AS an office in Singapore. The office in Singapore has 6 employees working from the office in Singapore.

### 3 GUIDELINES AND ROUTINES

The Hesnes Group has embedded the work on fundamental human rights and decent working conditions under the Transparency Act in the boards of the companies in the Hesnes Group and appointed one designated person from each company to follow up the practical work on due diligence under the Transparency Act. For several companies the designated person is the CEO. If the designated person is another person than the CEO, the designated person cooperates with the CEO in relation to the Transparency Act. The designated person regularly reports to the board on the work that has been done under the Transparency Act and will continue to do so in the future. The group CEO has had the overall leadership of the work on due diligence under the Transparency Act.

The companies' boards have also adopted internal guidelines to ensure regular follow-up of work on fundamental human rights and decent working conditions and updated the companies code of conduct for employees. The guidelines and the code of conduct are communicated to all employees. The guidelines have been reviewed and slightly updated after the first version was adopted in 2023.

On hesnes.no there is a separate tab regarding the Transparency Act. It also provides information about the email address [apenhetsloven@hesnes.no](mailto:apenhetsloven@hesnes.no) that can be used for questions to companies related to the Transparency Act, as well as for reporting related to the Transparency Act and is open to customers, suppliers and partners. No questions or reporting has been received until now.

The Hesnes Group has for several years had a code of conduct applicable for amongst others employees and suppliers published on the Hesnes Group webpages. This code of conduct was updated in 2023 in connection with the first work under the Transparency Act. The update was to develop a separate code of conduct for suppliers and business partners and – in short - generally highlight fundamental human rights and decent working (previously this was covered under general compliance with law provisions in the code of conduct).

This updated code of conduct for suppliers and business partners have been communicated to some of the suppliers and business partners and will be continued to be communicated to suppliers and business partners going forward. For the bunker trading part of the business (Norwegian Oil Trading AS) the Hesnes Group Code of Conduct is referred to in all requests to Norwegian Oil Trading AS' suppliers, must be adhered to by the supplier at all times and forms an integrated part of the agreement between a supplier and Norwegian Oil Trading AS.

#### 4 THE DUE DILIGENCE ASSESSMENTS

- 4.1 The Hesnes Group has a starting point used the same method for the due diligence assessments for all companies in the group.
- 4.2 As for 2023, our due diligence work started with an overall analysis and gathering of information for our own business, suppliers and business partners. The purpose was to identify which areas pose the highest risk of negative impact on fundamental human rights and decent working conditions. Our business, suppliers and business partners are largely the same as for our due diligence assessments in 2023. Our own business firstly consists of employees at our offices in Norway and Singapore. All employees are employed in accordance with legal requirements in Norway and Singapore. We buy other services for our own business, such as renting office space, IT services, auditing, etc. These are thus suppliers to us. The bunker trading and shipowning part of the business is described in particular in item 4.9 and 4.10 below.
- 4.3 We obtained a complete list of suppliers and business partners (hereinafter collectively "**Suppliers**") during the relevant period. This overview was compiled by obtaining lists of Suppliers to whom we have had payments during the period.
- 4.4 After the Suppliers had been identified, an assessment was made of which Suppliers should be followed up in further mapping.
- 4.5 The list of Suppliers was then further limited according to criteria such as the size of payments from us, industry (group and product category), geography (place of production and place of origin) or whether the Supplier itself is covered by the Transparency Act.
- 4.6 The purpose of the limitation was to create a starting point for further mapping. In the further mapping, we first looked at publicly available information on the risk of violations of fundamental human rights and decent working conditions, related to the geography and industry of the relevant Suppliers. We used reports and information from the OECD, Norwegian Contact Point for Responsible Business Conduct, international organizations, special interest organizations and national human rights institutions. For Norwegian Oil Trading AS, a particular mapping tool is also used (see item 4.10 below).
- 4.7 For the Hesnes Group's business, we have detected that the highest risk is the general risk of working conditions in the shipping industry and in the oil and gas industry. Geographically, in particular the business of Norwegian Oil Trading AS involves Suppliers from several countries and thus a greater geographical risk than the geographical risk for the companies in the Hesnes Group with mainly Norwegian Suppliers.
- 4.8 We noted that for all companies save for the companies involved in bunker trading and shipowning (Norwegian Oil Trading AS and Attic Forrest AS), the Suppliers are with very few exceptions large, Norwegian companies providing services to the companies in the Hesnes Group. The majority of such Suppliers are also themselves subject to the Transparency Act. We have reviewed the statements under the Transparency Act of such

Suppliers and based our due diligence assessments on these. However, as of the date we conducted our due diligence assessments several of the published statements of the Suppliers are for last year (2023). We will review the 2024 statements of the Suppliers after these are published and will update our statement if this is necessary after the review. For certain Suppliers for instance not themselves subject to the Transparency Act, we requested information on whether the Supplier's own operations, supply chains or business contacts involved a risk of negative impact on fundamental human rights and decent working conditions. Satisfactory responses were received.

- 4.9 For the shipowning part of the business (Attic Forrest AS) the charterer is doing their own due diligence assessments under the Transparency Act, and the charterer's statement from 2023 included in particular assessment of the general risk for violations of workers' rights and assessment of the manager of the vessel. We will also review the 2024 statement of the charterer when this is available and will update our statement if this is necessary after the review.
- 4.10 For the bunker trading part of the business, Norwegian Oil Trading AS ("**NOT**") noted in 2023 that it was difficult to obtain information from Suppliers worldwide. NOT therefore obtained the screening tool "[Refinitiv World-Check Risk Intelligence](#)", which has been prepared by the London Stock Exchange Group. The origin of this tool was the checking of data for politically exposed person (PEP) monitoring, anti-money laundering screening and financial crime control. The screening tool has a constant monitoring of all major international and national watch lists and sanctions lists published by state and non-state bodies, related to financial crime, fraud and corruption, etc. and check of sanctions, watchlists or regulatory and law enforcement lists. It also checks among other things human trafficking and other human rights abuses, environmental crimes, migrant smuggling, slave labor. NOT are checking all their Suppliers towards the World-Check system. The Hesnes Group Code of Conduct is referred to in all requests to NOT's Suppliers, must be adhered to by the Supplier at all times and forms an integrated part of the agreement between a Supplier and NOT. Specific questions in relation to the Transparency Act are also sent to a selection of NOT Suppliers. Furthermore, NOT is checking the geography of the Suppliers generally. Any findings are followed-up with further questions to the relevant Suppliers.

## 5 CONCLUSION

We have detected the general risks set out in item 4.7. We have followed up and will continue to follow up as set out in item 4.8, 4.9 and 4.10. We also communicate our code of conduct for suppliers and business partners to the suppliers and business partners of the Hesnes Group and will continue to do so going forward. For the bunker trading part of the business (Norwegian Oil Trading AS), the Hesnes Group Code of Conduct is referred to in all requests to Suppliers, must be adhered to by the Supplier at all times and forms an integrated part of the agreement between a Supplier and Norwegian Oil Trading AS. After this, we have not uncovered actual negative consequences or material risk of negative consequences through our due diligence assessments. Going forward we will keep monitoring in particular the risks in the shipping industry and oil and gas industry, and the associated risks with our business. We will also review the 2024 statements of the Suppliers after these are published and will update our statement if this is necessary after the review.

We will also follow up any reports of possible violations of fundamental human rights and decent working conditions that we receive.

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20 June 2024

signed electronically by the boards and CEOs of

Hesnes Holding AS

Hesnes Shipping AS

Hesnes Invest AS

Attic Forrest AS

Norwegian Oil Trading AS

Hesnes Management Services AS

Hesnes Insurance Brokers AS