

Citec Norway AS

Norwegian Transparency Act Statement 2022



MANUALS

ONLINE-LAB...

- BRASS PIVOT RING [x1]
- OHM METER [x2]
- 10 VOLT TEST BATTERY [x1]

MAXData

RULES

- Enable automation using supporting systems
- Report any/all unsafe conditions immediately
- Use eye-protection when working is being done in lab
- Remove/secure loose clothing, long hair and jewelry
- Stay out of safety zone, unless you are operating the machines

Production Capacity: 409/day

Uptime: 99%

Energy State : Active

Pressure : 42/3

Auto

Errors : 0

CONNECTED

SYSTEM NO	SENSOR NO	LOCATION
1	5848	LEFT
2	7845	RIGHT

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1. Introduction / About Citec

Citec Norway AS is established for the purpose of providing engineering and project management services within the sectors oil, gas and new energy. These services are provided inside and outside of Norway. The registered office of Citec Norway AS with Org.nr. 990 019 851 is Strandveien 37, 1366 Lysaker. Citec Norway AS is 100% owned by Citec Group Oy Ab, located in Vaasa, Finland. Citec Group Oy Ab is 100% owned by Sentiec Oyj located in Vaasa, Finland. Since 1st of September 2022 Sentiec Oyj is 100% owned by Cyient Limited, registered in Hyderabad, India.

This Transparency Act Statement has been prepared in line with the “Act relating to enterprises’ transparency and work on fundamental human rights and decent working conditions (Transparency Act)”. It refers to the financial period 01.07.2022 until 31.03.2023.

Citec, Citec Group, Sentiec (“Citec”) are fully committed to respect human rights and decent working conditions. They follow the UN sustainability goals (SDGs) with principals on environment, sustainability as well as principles on anti-corruption. Citec established policies and procedures which have been adopted in all Citec companies. Supply chain in our operations mainly includes purchasing engineering and construction services from external contractors or subcontractors. Particular focus is on external procurement with specific policies, as Citec aims at ensuring that external suppliers confirm the same commitment to compliance, ethical business practices and accepted sustainable development principles as Citec committed to. Unless not indicated from another context, references to “we”, “us” or “our” refer to Citec.

2. Operations and Business Model

Citec has operations in six countries. Citec has an own geographical presence in Finland, Norway, Sweden, Germany, France, and India, and has a joint venture company in Saudi Arabia. For several years, Citec Group has operated on the principle of “global resourcing and local presence”. This means that whole Citec Group has globally expertise and resources globally experts for each project. Local applicable laws and regulations for human rights and labour laws are followed in the countries where Citec is present, as well as the Ten Principles of the United Nations Global Compact for human rights, labour, environmental responsibility and anti-corruption, as well as internationally acceptable ethical standards and business practices. Citec’s global way of working requires the continuous compliances with all standards to avoid any dilemma in the global way of working together in projects.

Citec's key strategical focus is on developing and nurturing long-term customer partnerships, and the essential means is successful key account management and sales.

In Norway Citec operates with its company Citec Norway AS in the energy sector including new energy, process, oil & gas & electro fuels and machinery & equipment markets, providing engineering solutions for plants and products, engineering consultancy, technical documentation and digital solutions.

Further information about Norwegian operations is available at www.citec.com/regions/norway/.

3. Citec Code of Conduct and Policies

Citec has constituted a code of conduct which refers to the United Nations Global Compact. It comprises the fundamental understanding of our adherence to the Ten Principles of the United Nations Global Compact for human rights, labour, environmental responsibility, anti-corruption and bribery, as well as to applicable laws, ethical standards and business practices. This Citec Code of Conduct forms the framework for all our operations and sets our standards of behaviour.

It articulates Citec's self-understanding in relation to human rights and labour protection, data protection, fair competition and anti-bribery, as well as environment and compliance in general in dealings with each other within the company, but also with all partners, customers, suppliers.

In addition, policies elaborate specific objectives in the context of Citec's business operations, as Citec Environmental Policy and Citec Health and Safety Policy.

In our Citec Mode of Operations we have described our way of working in an operational framework with clearly defined processes, organization, authorization and approval structures. This creates transparency and is part of our open communication within the organization. We encourage everyone to speak up if there is a violation of laws or Citec Code of Conduct. Citec has a Whistleblowing Channel as we are committed to protect whistle-blowers in accordance with applicable laws.

Citec has developed a specific Citec Whistleblowing Policy reviewed and approved by Citec Group's Board of Directors. It applies to all employees, shareholders, employees of Citec companies' customers and suppliers and any other third party in contact with Citec companies in context of work-related activities. In the context of this Policy "Whistleblowing" means the reporting of suspected misconduct, illegal acts or failure to act in accordance with Group policies by applicable addressees.

The Citec Whistleblowing Policy is based on the EU Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and is applicable to Citec Norway AS. Based on the Citec Whistleblowing Policy Citec established the whistleblowing process.

A whistleblowing report can be submitted anonymously. Grant Thornton receives reports submitted and acts as case manager. Grant Thornton case manager passes anonymous reports to a Citec Ethics Team which conduct investigations based on the anonymous report. The reporting person is protected. No

personal reference is disclosed as Citec Ethics Team only receives anonymous information and report from Grant Thornton. Grant Thornton is standing by to assist in investigations. The Citec Ethics Team summarizes the whistleblowing report, the result of investigations and conclusion about further actions or closing the case. When no longer needed, the whistleblowing report is deleted. The external case manager from Grant Thornton supports throughout the process. By date of this submission no whistleblowing report case had been submitted.

4. Human Rights and Supply Chain

Citec's core company values are impact, excellence and respect. Citec follows the United Nations Global Compact principles, as well as other international standards for Human rights. Business ethics with transparency have been considered important topics for Citec.

Citec's employees are the backbone of the business. Consequently, social sustainability is important in Citec's operations. Citec's focus on Social Sustainability is on attracting, retaining and developing our employees, current and future. The focus is also on everyone having proper working conditions for the health and safety as well as employee well-being. Citec proactively promotes United Nations Sustainable Development Goals as well as the United Nations Global Compact.

Citec's guidelines regarding decisions related to employees and other stakeholders are set in Citec HR policy, Citec Health & Safety policy, Citec Communications policy, Citec Information Security policy, Citec Data Protection and Privacy policies and Citec Supplier policies.

The Citec HR policy sets the overall guidelines for managing personnel, whether on Citec's direct payroll or as external consultants at Citec. Complementary policies and instructions are established locally in the Citec Norway AS. Citec is committed to fair and safe working conditions, emergency and safety procedures, equality as well as zero discrimination and harassment.

With the Health & Safety policy, Citec promotes proactively well-functioning and safe working, prevent and support physical, mental and social and well-being as well as safe and healthy work environment in own offices, working at customers premises and during business trips. Furthermore, Citec strives for injury free workplaces and business travels.

The purpose with the Citec Health & Safety policy and the Citec HR policy is to align Citec companies with international and national legislation, authority requirements as well as United Nations Global Compact in any labour matter. Citec companies do not, for example, use hidden or undeclared labour force nor accept discrimination in any form. EHS internal audits are part of the annual review process, including risk assessments by site, compliance with employment and health & safety legislations etc.

In Citec Norway AS prevention and mitigation of health and safety risks play an important role. The project related business requires to focus on the wellbeing of employees, including mental, physical and social wellbeing as well as environment at workplace as a certain risk for stress and related illness is observed. Human Resources monitors regularly specific KPIs as the number of sick leave days or the attrition rate. The employee satisfaction is also analyzed based on employee surveys. There is a close cooperation between

the occupational safety committee, Human Resources and occupational health care service. Risk assessments and workplace surveys are conducted. The company offers trainings on health and stress management and also offers to provide guidance in mental wellbeing by external experts, e.g. "Auntie" program.

As Citec Norway AS acquires regularly services from external suppliers, mainly for engineering and construction services, Citec policies, ethical business practices and principles are to be accepted and applied by external contractors and subcontractors. Citec developed a specific Supplier Management and Purchasing Process. It defines that Citec uses suppliers who follow national regulations as well as UN Global Compact principles.

5. Assessment of Actual and Potential Risks Related to Employees and Stakeholders

Citec's business consists of expert services in different engineering and documentation fields. These services are provided by high-skilled and trained professional employees with specific technical or commercial education and related certificates. From external third parties Citec Norway AS also acquires engineering and construction services, as well as IT support, accounting and administration services. For external staff same high-skilled education applies as for own employees. No risk of child labour was assessed.

From the different social perspectives there are risks. Failure in recruiting qualified personnel, lack of needed competence in business-critical projects and key persons leaving are main risks related to personnel. These could lead to excess workload for employees and negative psychological consequences. Employees could feel obliged to undermine the working time regulations and work too long. This could increase the risk of and could lead to stress-related illness, burn-out and absenteeism. Quarterly based the working hours and breaks in between the working days are monitored as well as the annual leaves. If risks were identified measures were taken on individual level, like taking days off as per order of the Line Manager.

Citec does not tolerate any discrimination or harassment based on race, nationality, gender, age or any other reason and treats everybody equally. To mitigate such risks, Citec communicates regularly and reminds about one of the core values, respect. Citec provides possibilities for the employees to bring forward any possible cases through different channels, employee surveys, employee representatives, occupational health care or the human resources department.

Human Resources evaluates on the diversity and equality aspects among the employees. Analysis is conducted regularly for this and reported to the management to identify potential breaches and take accordingly measures.

All Citec employees are expected to act for the best interest of Citec, to safeguard the Citec brand and the company reputation. Friendships and relative relationships in business context are in Citec's attention, e.g. supervising or hiring close relatives as direct sub-ordinates is not allowed.

What we expect from our employees, we expect the same from our external contractors and subcontractors. Citec's Supplier Code of Conduct sets the standard for how we expect our suppliers to act. We have a process for pre-screening and monitoring sustainability risk from supply chain. Citec supplier screening and monitoring include Human rights.

6. Environment, Sustainability and Supply Chain

Citec's basis for the Environmental, Social and Governance (ESG) approach is incorporated in Citec's Operational Framework. Within the Operational Framework, the Citec Operational policy and Citec Code of conduct govern the company's ESG decisions and actions from a broad perspective.

Citec's Environmental Sustainability approach consists of three parts: selected sustainability technologies, value engineering and own sustainability actions. Citec does not have major environmental risks of its own, as Citec is not a manufacturing company by origin. Therefore Citec aims to support environmental sustainability by bringing technically sustainable solutions to customer projects through value engineering. The Social Sustainability approach incorporates how Citec manages relationships with employees, customers, suppliers and the communities where the company operates, as described above in chapter "Human rights and supply chain."

7. Assessment of Actual and Potential Risks in our Supply Chain.

Services provided by external contractors or subcontractors bear the risk that external service providers deviate to comply with Citec values, Citec Code of Conduct and related principles and miss compliance with legal requirements in their supply chain. Concretely, such risks can arise from suppliers missing integrity and move beyond the law and beyond compliance with regulations, e.g. environmental protection, privacy and occupational health and safety. There is a risk that suppliers miss the respect of human rights, do not apply standards of working conditions, equally working conditions and pay or freedom of discrimination or do not follow privacy and data protection.

8. Measures to Cease, Prevent and Mitigate Actual, and Potential Adverse Impacts in our Supply Chain

Citec's aim is to have systematic management of all operations. The Citec Operational Framework is ISO 9001 certified by Bureau Veritas, and is regularly monitored, developed and updated. In addition, Citec Oy Ab has an Achilles certificate for suppliers in Nordics and Central Europe pre-qualification system. Citec Norway AS has an JQS certificate of qualification for suppliers to the oil and gas industry in Norway and Denmark.

Citec has adopted the United Nations Sustainable Development Goals. Citec strives towards access to affordable, reliable, sustainable and modern energy for all (Goal 7), aims to build resilient infrastructure and to promote inclusive and sustainable industrialisation (Goal 9), and make cities and communities inclusive, safe, resilient and sustainable (Goal 11). Citec is also committed to take action to combat climate change and its impacts (Goal 13) and to protect ecosystems and halt biodiversity loss (Goal 15).

Citec has developed and maintained a Global Supply Management System to minimize risks in the supply chain. Basic objective is to prioritize approved suppliers with known, verified background, of approved quality and competences, i. e. reliable partners in the supply chain.

This Global Supply Chain Management Systems consists of

- a Supplier Register Tool to which a limited number of persons have access,
- a Process description of Supplier Management and Purchasing process (SP7)
- Procurement Principles and Guidelines in Common Rules and Regulations for External Procurement of Citec Group
- a Supplier Services and Skills Report
- Appendix 2 to a Supplier contract (Compliance with Laws and Company Policies)
- Approval Principles about who order / acquire from suppliers

The Supplier Register contains relevant information from suppliers to ensure that services are purchase from the right suppliers with the right quality and compliance.

The Supplier Management and Purchasing process begins with a request for a purchase which must be approved. After approval requests for quotations are sent. Suppliers are selected as first choice from Supplier Register. Quotations received are to be analyzed, offers are compared. A supplier audit follows for suppliers whose data has not been available in the Supplier Register. A purchase order follows.

Common Rules and Regulations for External Procurement of Citec Group include Procurement Principles and Guidelines as well as Compliance Verification. They describe the Citec supplier selection criteria which explicitly refer to supplier compliance with all laws and regulations applicable to its operations as well as the supplier's commitment to ethical business practices and accepted sustainable development principles.

The compliance verification emphasizes the responsibility of Citec Norway AS to require that all suppliers comply with their statutory obligations as contracting partner and as supplier.

This is documented by an "Appendix 2: Compliance with Laws and Company Policies" which is added to a contract with a supplier. Appendix 2 binds the supplier to comply with lawfulness, compliance with local, i.e. Norwegian regulations, compliance with Citec policies, as the Citec Code of Conduct, human rights, data privacy, illicit payments, export control and sanctions.

Citec approval principles are an additional instrument of internal control to ensure that purchase orders follow an approval process.

Signatures to the Norwegian Transparency Act Statement for the year 2022

Lysaker, 30. June, 2023

DocuSigned by:

Espen Berg

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Espen Berg, Managing Director

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John Renard

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John Patrick Renard, Chairman of the Board of Directors

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