

# Norwegian Transparency Act Statement 2024



# Contents

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1. Introduction / About Cyient .....	3
2. Operations and Business Model .....	3
3. Cyient Code of Conduct and Policies.....	4
4. Human Rights and Supply Chain .....	5
5. Assessment of Actual and Potential Risks Related to Employees and Stakeholders.....	7
6. Environment, Sustainability and Supply Chain.....	9
7. Assessment of Actual and Potential Risks in our Supply Chain. ....	10
8. Measures to Cease, Prevent and Mitigate Actual and Potential Adverse Impacts in our Supply Chain .....	12

## 1. Introduction / About Cyient

Cyient 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 Cyient Norway AS with Org.nr. 990 019 851 is Strandveien 37, 1366 Lysaker. Cyient 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. Sentiec Oyj is 100% owned by Cyient Europe Limited, located in Reading, United Kingdom. Cyient Europe Limited 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 (Norwegian Transparency Act)”. It refers to the financial period 01.04.2023 until 31.03.2024 and is referred to as “financial year 2024”.

Cyient Norway AS, Citec Group Oy Ab, Sentiec Oyj and Cyient Group (“Cyient”) 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. Cyient established policies and procedures which have been adopted in all Cyient companies. Supply chain in our Norwegian operations mainly includes purchasing engineering and construction services from external contractors or subcontractors. Particular focus is on external procurement with specific policies, as Cyient aims at ensuring that external suppliers confirm the same commitment to compliance, ethical business practices and accepted sustainable development principles as Cyient committed to. Unless not indicated from another context, references to “we”, “us” or “our” refer to Cyient.

## 2. Operations and Business Model

Cyient Group has operations in 22 countries worldwide. With its European headquarter located in the United Kingdom, it has own geographical presence in other European countries, as in Finland, Norway, Sweden, Germany, France and Portugal. Cyient has operated on the principle of “global resourcing and local presence”. This means that Cyient 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 every country where Cyient is present. The 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 are a natural part.

Cyient developed a Global Cyient Code of Ethics and Business Conduct (“Code”) which is founded on our shared vision and values. It applies to all Cyient associates and business operations worldwide. Cyient’s

global way of working requires the continuous compliances with all standards to avoid any dilemma in any country .

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

General information about Cyient can be found in Cyient’s corporate reports:

- Annual Report 2024 for Financial Year 1 April 2023 – 31 March 2024
- Sustainability Report 2023
- Corporate Governance Manual
- Code of Ethics and Business Conduct

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

### 3. Cyient Code of Conduct and Policies

The Company (Cyient Ltd. and all its global subsidiaries) believes in the conduct of the affairs of its various constituents in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity and ethical behavior. The Company has a specific code of conduct for the Board of Directors and Senior Management Personnel. It has specific focus on anti-corruption and anti-bribery and is monitored regularly. All associates are governed by the Code of Ethics and Business Conduct of the Company. All Codes and Policies aim to ensure compliance across the business in all countries.

Cyient has also developed a specific Whistleblowing Policy which is found in Cyient Process Asset Library (PAL) in company’s Intranet and company’s webpage as Cyient Whistle Blower Policy Procedure V 1.3. .. Incidents or reports are submitted confidentially via Syntrio Anonymous Reporting to a Whistleblower platform. The Whistleblower platform is maintained by an external provider Lighthouse Services and can be reached by using the link: <https://www.lighthouse-services.com/cyient> . It applies to all employees, shareholders, employees of Cyient companies’ customers and suppliers and any other third party in contact with Cyient 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.

This Whistleblower Policy (“the Policy”) has been formulated as a Global Policy and with a view to provide a mechanism for associates, clients, vendors of the Company to approach the Ombudsperson/Chairman of the Audit Committee of the Company to report to the management instances of unethical behavior, actual or suspected, fraud or violation of the Company’s Code of Conduct or policy.

The objective of the Whistleblower policy is to provide associates, clients and vendors an avenue to raise concerns, in line with Cyient’s commitment to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication. Further, to provide necessary safeguards for protection of associates, clients and vendors from reprisals or victimization, for whistle blowing in good faith.

A complaint can be registered by using the Ethics Reporting System. To ensure utmost confidentiality Cyient has engaged the services of an independent organization specializing in Ethics Helpline services.

The Ethics Reporting System has the following mechanisms to record a complaint:

- Website - using the link <https://www.lighthouse-services.com/cyient>
- E-Mail: [Ombudsperson@cyient.com](mailto:Ombudsperson@cyient.com) (will be received by Ethics Helpline Team only)
- Phone: Please refer Annexure-2 of Whistleblower Policy.

There has been no reports registered from Norway via whistleblowing channel and there are also no open or pending incidents recorded or ongoing investigations.

## 4. Human Rights and Supply Chain

Cyient has a business imperative to be a responsible, accountable, and equitable company. The foundation of which is our values of Fairness, Integrity, Respect, Sincerity, and Transparency (FIRST). We believe it is our responsibility to respect and protect human rights and to contribute to positive human rights impacts. We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. Our aim is to help increase the enjoyment of human rights within the communities in which we operate.

Our Human Rights Policy is a cornerstone in these endeavors. All Cyient associates follow our Code of Conduct.

Cyient is committed to protecting human rights and to providing equal opportunity for all associates, as well as meeting international standards for Human rights. Business ethics with transparency have been considered important topics for Citec. Cyient prohibits all forms of modern slavery including human

trafficking, forced or compulsory labor, slavery, servitude, debt bondage, deceptive recruiting for labour or services, and child labour, including situations where children are subjected to slavery or similar practices or engaged in hazardous work, in its organization, business operations, and supply chain. Cyient will not employ children at the workplace and will not use forced labour in any form. Associates who work with vendors are required to ensure that this Code and related policies on human rights are incorporated into all contractual and operational processes of Cyient's vendors on a worldwide basis

Our Human Rights policy applies to all Cyient Ltd. and all its subsidiaries. Our Human Rights policy is based on the following 10 principles:

- Respect for Human Rights
- Community and Stakeholder Engagement
- Inclusion and Diversity • Anti-harassment and nondiscrimination
- Freedom of Association and Collective Bargaining
- Safe and Healthy Workplace
- Workplace Security
- No Modern slavery and Human Trafficking
- No Child Labor
- Work Hours, Wages and Benefits

At Cyient it is every associate's responsibility to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment, aligned with our Human Rights Policy. If any associate believes that someone is violating the Human Rights Policy and/or the law, they are asked to report it immediately to their manager, Human Resources, Company legal counsel or our third-party ethics line. <https://www.lighthouse-services.com/cyient> .

Cyient's guidelines regarding decisions related to employees and other stakeholders are set in Cyient HR policy, Human Rights Policy, Modern Slavery statement, Code of Ethics and Business Conduct, Leadership, Nomination and Remuneration Policy, Corporate Governance Manual, Anti-Corruption Policy, Policy on Prevention of Sexual Harassment, Environmental, Occupational Health and Safety policy.

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

With the Occupational Health & Safety policy, Cyient 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, Cyient strives for injury free workplaces and business travels.

The purpose with the Cyient Occupational Health & Safety policy and the Cyient HR policy is to align Cyient companies with international and national legislation, authority requirements as well as United Nations Global Compact in any labour matter. Cyient 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 Cyient 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 monitor regularly specific KPIs as the number of sick leave days or the attrition rate. The employee satisfaction is also analyzed based on employee surveys. Cyient Norway has participated in Associate Satisfaction Survey (ASAT) in 2023. ASAT provides opportunity to voice candid opinion and inform of what is going well and what needs attention. Cyient uses an external survey partner, Willis Tower Watson in order to ensure the confidentiality and anonymity of employee's responses. Survey results provide an overview of strength areas and opportunities for improvement. Furthermore, Human Resources in cooperation with business unit leaders develop an action plan for associate engagement and improvement initiatives. This is also aligned to company's overall goals for current and upcoming year.

There is a close cooperation between the safety delegate, Working Environment Committee and Human Resources at Cyient Norway. Local authorities are contacted whenever needed. Risk assessments and workplace surveys are conducted. Actions are taken as needed in order to manage and minimize identified risks. For example, Cyient Norway has implemented an initiative on preventing and reducing health risks related to seasonal influenza. Annual influenza vaccination was provided to all associates at Cyient Norway. The initiative was well received among the associates and had a positive effect on mitigating risk related to lack of resources in business-critical project.

The company offers trainings on health and stress management, as well as guidance on mental wellbeing through external service providers, e.g. "Auntie" program or Gjensidige mental health program. As Cyient Norway AS acquires regularly services from external suppliers, mainly for engineering and construction services, Cyient policies, ethical business practices and principles are to be accepted and applied by external contractors and subcontractors. Cyient has developed a specific Supplier Management and Purchasing Process. In case of Sub-contracting, all the Terms & Conditions agreed by Cyient with its customers will be passed on to the sub-contractors as Flowdown Terms & Conditions.

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

The business of Cyient Norway AS 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 Cyient 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 and could lead to stress-related illness, burn-out and absenteeism. Monthly based 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.

Cyient 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, Cyient communicates regularly and reminds about one of the core values, respect. Cyient provides possibilities for the employees to bring forward any possible cases through different channels, employee surveys, employee representatives, 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.

Cyient is built on strong values and that foundation has brought the company to where it is today. We always follow our Values **FIRST**, which is an acronym for Fairness, Integrity, Respect, Sincerity, and **Transparency**.

**Fairness** – Means equity and solidarity where the associates and our Customers experience an unbiased environment, irrespective of their cultural backgrounds. The company believes in providing an encouraging and motivating ambience which enables our associates and customers to meet their personal and organizational objectives.

**Integrity** – Cultivates the development of high professional standards and values. The company in all dimensions of work, aligns its actions with its words and delivers what it promises. The company is committed to the moral and ethical values of the organization and law of the land and expects the same honesty and integrity from its Vendors.

**Respect** – The Company believes that the most productive environment is one wherein associates are valued and treated with respect and dignity.

**Sincerity** – Is a commitment to present a work place which establishes professionalism, dedication to quality, cost, and delivery, and embodies Cyient's value system, while speaking and acting truly to achieve the company's vision and realistic goals. The company has always demonstrated utmost reliability and accountability for all its commitments and promises and strives for the same ahead.

**Transparency** – Is an open-door policy. The company believes that a fair and open communication is the key to success. The company believes in clear billing processes and ensures availability of relevant



information required for cooperation and collective decision making. Encouraging feedback from vendors, customers, and associates helps build a trustworthy company.

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

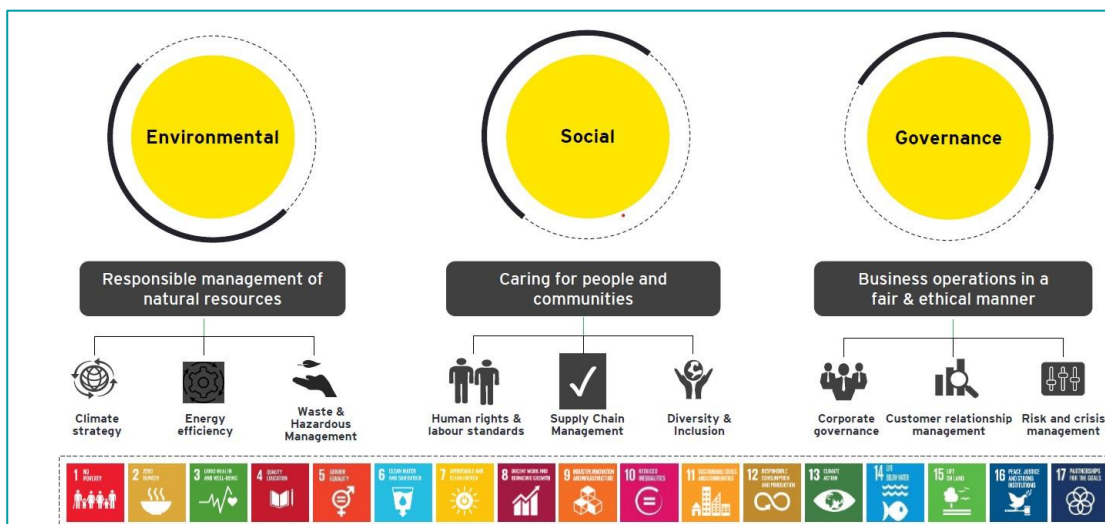
What we expect from our employees, we expect the same from our external contractors and subcontractors. Cyient’s Supplier Code of Conduct sets the standard for how we expect our suppliers to act.

As part of FIRST values “R” Respect, Cyient firmly believes that the Vendors are an integral part of our ecosystem and Cyient is committed to create an environment where our Vendors are confident that they are treated with respect and dignity.

As part of FIRST values “I” Integrity and “T” Transparency, Cyient firmly believes in conducting all business transactions with integrity and transparency and ensures that it is ethical, sincere and open in all its transactions. We expect our Vendors to maintain the values of integrity, ethics, and transparency in all business dealings, which are in line with the Cyient’s policies and applicable laws.

## 6. Environment, Sustainability and Supply Chain

Cyient is fully committed to shaping a sustainable tomorrow. It collaborates with clients to address their sustainability challenges and opportunities. This commitment is embedded in the recognition of a robust Environmental, Social and Governance (ESG) framework.

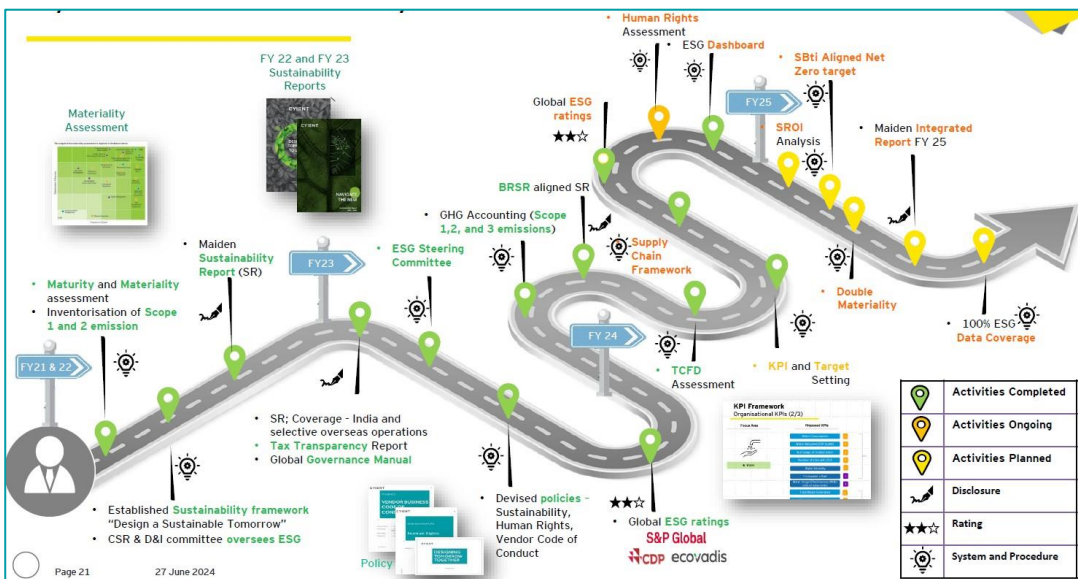


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Any risk arising out of events related to Environmental factors, social factors or Governance lapses resulting in uncertainty of business activity are covered in ESG risk. These can be attributed to but not restricted to climate risk, emissions risks and other discharges of the company's manufacturing or carbon emissions activities in Environmental risks; events like strikes, community engagement, workplace harassment or discrimination among other Social Risks and any Governance risks including violations of regulatory and legal nature resulting economic losses or reputational damages.

The diagram below shows the ESG journey that Cyient has embarked over the last three years and the actions planned for this coming financial year. Our first external Sustainability Report was published two years ago and we track our ESG progress using the internationally recognized S&P Global ESG Index. Our most recent score was 73/100.



Cyient maintains an Environment Management System (EMS). Cyient defined an Energy and Emission Management which set climate goals as e.g. emission reduction, renewable energy strategy, water and waste management. Details can be found in Cyient's ESG Factbook.

## 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 Cyient values, Cyient 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.

It is the policy of Cyient to Review and Manage the risks that may arise from availing services and supplies from its 3rd party vendors or from outsourcing any of the processes or services that are required by Cyient.

All the Vendors will be required to go through our Vendor Registration process before they are allowed to start business transaction with Cyient. As part of the Vendor Registration process, all Vendors would be providing basic compliance documentation such as Tax Registration document, proof of Bank Account information etc. In addition to this, the Vendor Code of Conduct has been made a part of the General and Standard terms & conditions of all the Purchase orders that will be issued by Cyient.

Cyient has a policy of assessing the Risk associated with its critical and major vendors across geographies.

As part of the Vendor Risk Assessment policy, the top 100/200 suppliers based on the spend data of the previous Financial Year will be considered for Vendor Risk Assessment covering ~70% of the total spend. This policy is applicable to all materials, Services and subcontracting services providers related to Cyient Ltd and its subsidiaries across all the geographies where Cyient has its operations.

Cyient will perform risk assessment on Vendors on the risk types listed below. Cyient has engaged Dun & Bradstreet to conduct the Vendor Risk Assessment on their platform using either the readily available information on their platform or initiate a fresh research and report for any vendors who are not registered with Dun & Bradstreet.

**Legal & Regulatory Compliance Risk** – Regulatory risk is the uncertainty in business owing to changes in regulatory framework or laws in a jurisdiction where the business is conducted. Any enforcements or enactments that are detrimental to the business activity are covered as a part of the regulatory risk. Legal risk can either be a subset of the regulatory risks defined above or independently occurring risk that prevents any parties from fulfilment of contractual obligations or business objective when in violation of the laws applicable to a business in the jurisdiction of business activity.

**Financial Risk:** Financial risk is the uncertainty involved with respect to capital involved in conducting a business activity. This may be on account of credit risk that may jeopardize the capital investment in a business transaction, loss debt extended or any other risk arising out of monetary transaction involved while conducting a business activity. This definition is restricted to the risk arising out for outward business transactions and does not involve capital exposures, non-performing assets, investments, or any other forms of capital employment.

**Sanctions Screening** – Is a mechanism to avoid risks arising out of business activities involving economic sanctions against any parties. These are a subset of regulatory risks as a measure to mitigate regulatory risks.

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

Cyient's aim is to have systematic management of all operations. Cyient Group is ISO 9001 certified, and is regularly monitored, developed and updated.

Cyient Norway AS are fully registered as a supplier on the Achilles Global Energy community which is compliant with NORSOK and IOGP requirements. Achilles ID: 00034725 and Expiration Date: 31 March 2025.

Cyient strives towards access to affordable, reliable, sustainable and modern energy for all, aims to build resilient infrastructure and to promote inclusive and sustainable industrialisation, and make cities and communities inclusive, safe, resilient and sustainable (). Cyient is also committed to take action to combat climate change and its impacts and to protect ecosystems and halt biodiversity loss).

Cyient 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 Supplier onboarding process with a questionnaire capturing all the relevant statutory details of the suppliers.
- SAP system for raising the Purchase requisitions, Approving the Purchase Requisitions, Approving and placing the Purchase orders, Goods and Service receipt and accounting.
- Process description of Supplier Management and Purchasing process and procedure (FP-0017)
- Annual Supplier Performance Monitoring Process
- Annual Vendor Risk Assessment Process
- Annual Supplier Performance Monitoring Process
- Annual Vendor Risk Assessment Process.
- Appendix 2 to a Supplier contract (Compliance with Laws and Company Policies)

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. Request for quotations and Request for Proposals are sent and suppliers are identified and selected as per thresholds and procedures defined in the Global Procurement Policy & Procedure Guidelines

Common Rules and Regulations for External Procurement of Cyient Group include Procurement Principles and Guidelines as well as Compliance Verification. They describe the Cyient 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 Cyient Norway AS to require that all suppliers

comply with their statutory obligations as contracting partner and as supplier. Where there is a need for Sub-contracting the customer's work, all the relevant Terms & Conditions from the customer's MSA are flown down to the Sub-contractor and are made part of the agreement between Cyient and the Sub-contractor.

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.

Cyient 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 2024**

Lysaker, 28. June, 2024



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Espen Berg, Managing Director



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John Patrick Renard, Chairman of the Board of Directors