

List of Signatures

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Eureka Group Transparency Act - DD assessment 2022.pdf

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Transparency Act - Due diligence assessment 2022

Introduction

Eureka Group's objective is to create value by supporting our customers in the transition towards a sustainable future and on this basis develop a profitable company.

We believe that a strong focus on environmental, social and governance factors and issues is critical to our long-term success as a company. We are convinced that in this respect, the interests of Eureka Group's owners, align with those of our management, employees, customers, and the communities in which we operate.

From 2023 Eureka Group will publish an annual report of our due diligence assessment to comply with the Norwegian Transparency act that entered into force on 1 July 2022. The report will also be updated and republished in the case of significant changes to the company risk assessments.

Overall principles

Eureka Group seeks to ensure that we operate in an environmentally sound manner, as well as ethically, responsibly, and profitably in everything we do. Eureka Group aims to be transparent regarding all issues covered by these principles. Our governance system is based on the principles from the OECD guidelines for multinational enterprises and other relevant international guidelines.

The [OECD Guidelines for Multinational Enterprises](#) are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognized standards.

About Eureka Group

Eureka Group consists of the companies Eureka Pumps and Eureka Logistics, which provide process and safety critical equipment, products and solutions to the renewables and global oil and gas industry. Eureka Group contributes to customer safety and profitability through delivery, maintenance, and modifications of safety and production critical solutions. Eureka Group shall be the preferred supplier within its business area and shall be known in the industry for their product quality and innovative technical solutions, business ethics, professional skills, efficiency and flexibility in managing the work assigned by our customers.

The Group is headquartered in Oslo Norway with assembly & test site at Sørumsand outside Oslo, and workshop for service repairs and refurbishment in Risavika Stavanger.

Guidelines and procedures for handling adverse impacts on human rights and decent working conditions

Human rights and decent working conditions for all employees, suppliers and subcontractors are principles which cannot be compromised. Business conduct, ethical compliance and corporate responsibility are well established cornerstones in Eureka Group's governance and compliance system.

Eureka Group has implemented a comprehensive governance system including a strong corporate and organizational focus on compliance, HSE and other key risk areas. Eureka Group's Board of Directors (Board) is



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ultimately responsible for overseeing the company's governance. Management of risks related to human rights and decent working conditions is a line responsibility starting with Eureka Group's CEO who delegates this to corporate management and line management.

Eureka Group's governance system includes the following documents:

- Business principles for suppliers
- Supplier Declaration Eureka
- EPS-MGM-0008 Values and Ethics includes the following:
 - Anti-Corruption
 - Code of Conduct
 - Cyber Security
 - Data Protection
 - Diversity & Inclusion
 - Integrity Due Diligence
 - Payment procedure
 - Personal Trading
 - Sanctions Compliance
 - Whistleblowing

Eureka Group's Business principles for suppliers is available on our web site and contains fundamental requirements to do business with Eureka Group, including the requirements related to the Transparency Act. All suppliers to Eureka Group are required to confirm adherence through Supplier Declarations. Eureka Group requires its suppliers to extend the same requirements to their supply chain.

Eureka Group's business principles for suppliers and the supplier declaration form requires fundamental human rights and decent working conditions for all supply chain employees associated with Eureka Group. The business principles include expectations towards suppliers on social aspects such as human rights and health and safety, anti-bribery and anti-corruption (ABAC) and environmental topics (e.g. carbon footprint).

Eureka Group has established a set of internal procedures to ensure compliance with the Transparency Act. This includes implementation of a yearly materiality analysis based on supplier significance and a risk analysis based on international risk indices published by e.g. the UN, UNICEF, World Bank, OECD, Transparency International.

A due diligence assessment of existing suppliers is conducted on a yearly basis. High risk elements in the supply chain will be flagged and subject to special scrutiny, which may include audits, enhanced questionnaires, and documentation. Unsatisfactory results will be reviewed, and improvement plans, suspension or termination will be considered for implementation.

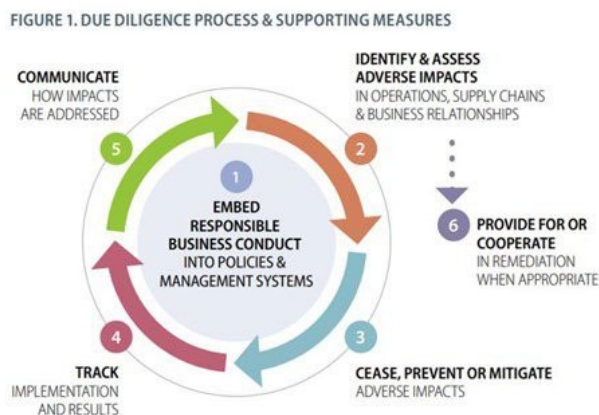


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Due diligence assessment

A due diligence assessment on Eureka Group’s supply chain has been carried out during 2022. The assessment will be carried out on a yearly basis going forward and follows the OECD Due Diligence Guidelines for responsible Business Conduct.



Eureka Group has carried out due diligence reviews with the following overall results:

- Moderate risk linked to manufacturing abroad.
- Moderate risk of corruption / violation of human rights with our key suppliers.
- Limited risk of child labour identified.

We have carried out a due diligence assessment for 2022 and no negative actual consequences were uncovered related to violation of human rights. Nor was any significant risk of negative consequences uncovered.

In accordance with the principle of proportionality in the Transparency Act a due diligence process focusing on parties with highest probability and risk of adverse impacts has been carried out. Eureka Group’s approach has been to start the due diligence assessment with a materiality analysis where suppliers who are in countries with an index of 3 or higher in accordance with the Global Rights Index - ITUC (ITUC = International Trade Union Confederation) were selected for further assessment. Materiality reviews were then conducted to focus on such suppliers with a total purchase value of over NOK 100,000 in 2022. The risk assessments were then carried out in a pre-defined risk matrix considering the various human rights elements, reviewed in light of the products or services purchased.



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Measures implemented to handle adverse impacts and risks

As mentioned no adverse impacts were identified in the due diligence process, however several measures have been imposed to reduce, prevent and mitigate risks of such impacts, including:

- Eureka Group staff are required to confirm adherence to the ethical guidelines and also to undertake *UN's fight against corruption training programme*.
- Suppliers are required to confirm adherence to Eureka Group's Business principles for suppliers to extend the same requirements to their suppliers.
- Updated "Terms & Conditions for Purchase" to emphasize the duty to respect basic human rights and decent work conditions.
- Updated "Supplier Declaration" to emphasize the duty to respect basic human rights and decent work conditions.
- Results from supplier HSE audits, inspections and walkabouts are part of Eureka Group's normal routines and are addressed directly with the supplier/subcontractor in question.

Information requests

The aim of the Transparency Act is that companies are open and transparent about how they are working with ESG issues. Any person has the right to information from a company regarding how the company addresses actual and potential adverse impacts uncovered by its due diligence. The right to information includes both general information and information relating to a specific product or service offered by the company and the answer to such a request must be «adequate and comprehensible».

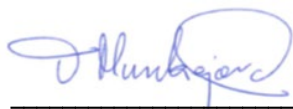
Eureka Group intends to comply with this, and general requests are usually handled directly by our company which have contact information available publicly online through our website. It is also possible to contact Eureka Group directly through our contact form at: <https://www.eureka.no/contact/> or through our whistleblowing hotline that is handled by the Eureka Group's legal representative: whistleblowing.eureka@glittertind.no



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Oslo , 28 June 2023



Tom Munkejord
CEO Eureka Group AS

Jan Erik Rugland
Chair of the Board

Board member
Tor Christian Bringedal

Geir Austigard
Bord member

Paal Espen Johnsen
Board member



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Appendix 1

This due diligence assessment applies to the following Group companies (all Norwegian operational entities):

- Eureka Pumps AS
- Eureka Logistics AS



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