

Statement under the Transparency Act

Sotra Link AS

Introduction

This report has been prepared by Sotra Link AS (the company) in accordance with section 5 of the Transparency Act.

For Sotra Link AS, it is important to contribute to responsible business conduct. We fully support and respect fundamental human rights and decent working conditions in our operations, and we expect our contractors, for engineering and construction, and for operations and maintenance, as well as other suppliers and business partners to do the same. Our due diligence assessments are based on this.

Organization

The core business of Sotra Link AS is to finance, manage, and implement Norway's largest infrastructure project, rv. 555 Sotrasambandet, as a public-private partnership project (PPP). The company has entered a PPP contract with the Norwegian Public Roads Administration (NPRA), and the purpose of Sotra Link AS is to fulfil this contract.

The company does not itself carry out any contracting activities but has outsourced the execution of work in the contract to two main contractors, for design and construction, respectively, and operation and maintenance in separate agreements. In the design and construction phase of the project, the company's main contractor is Sotra Link Construction JV ANS. The construction phase of the project began in spring 2023. In the operation and maintenance phase of the project, our main contractors will be Intertoll Norway AS, which is part of the Intertoll Group. Activity in this phase of the project will mainly start in 2027.

The head office of the company is located in Knarrevik, in Øygarden municipality. The company has four permanent employees, as well as advisory services on contract. The company is owned by Ibsen Investment Holdings Ltd. (Macquarie, General Partner, John Laing, Limited Partner), Webuild SpA, and SK ecoplant CO. Ltd.

Anchoring

The work to safeguard human rights and decent working conditions is anchored in the company's board and is part of our routines and is reflected in the company's ethical guidelines. The practical responsibility for daily follow-up lies with the CEO and other employees in the company. The head of HSE also has an important role in the work, through daily follow-up of main contractors as routines for safeguarding HSE, working conditions and human rights internally in their own company, but also with subcontractors. This is also part of the company's routines when it comes to meeting the requirements set by the Norwegian Public Roads Administration, lenders, and Norwegian law. The contracts contain partly comprehensive requirements, for example regarding safeguarding HSE, working conditions, human rights and risk management. These requirements are again mirrored and continued in our agreements with our main contractors.

Sotra Link AS has an office in the middle of the construction area, which provides close contact with employees of our main contractors and their subcontractors. Among the employees of Sotra Link AS, there are short lines and a good flow of information. Both provide an advantage in the work on the Transparency Act. If actual or potential human rights violations or decent working conditions in the business or supply chain are suspected, employees can report this through our whistleblowing procedures.

Internal routines

Sotra Link AS has routines to safeguard employees' rights and to ensure good working conditions in the business. The company complies with laws and regulations related to the working environment and working conditions, and we have routines to ensure HSE.

In general, the risk of accidents and injuries is considered low in Sotra Link AS, as we do not carry out any contracting activities ourselves, and no serious work accidents nor any other accidents have been reported. HSE is of high priority, and our work within HSE is continuously strengthened.

Sotra Link AS has ethical guidelines, which must be followed by all employees, and are expected to be followed by our suppliers.

Monitoring main contractors and the supply chain

Sotra Link AS has routines for assessing, following up and setting requirements for potential and existing suppliers and business partners. Before entering new supplier relationships, an assessment is made of the supplier's strengths and weaknesses. Furthermore, we are involved in the subcontractor approval process for our main contractors and regularly receive risk assessments of their supply chains. In addition, Sotra Link AS will participate in inspections in the supply chain during the project, where Sotra Link AS and the Norwegian Public Roads Administration can reject or reject rogue actors. This work is taken very seriously by Sotra Link AS.

In addition to the assessments before entering a contract and during the supplier relationship, Sotra Link AS conducts at least once a year a more general mapping of the risk of human rights violations in the supply chain and among our business partners. Further assessments are carried out continuously throughout the year if we receive information indicating that it is required, or circumstances otherwise warrant it. The most recent overall assessment was conducted in spring 2023.

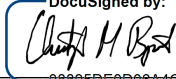
Our assessments are based on a separate guide and based on a range of sources, including the information already acquired about the supplier and the risk assessments received from our main contractors. Among the risk factors, industry risk and geographical risk are particularly important. Based on the general mapping of risk, a more detailed assessment of any identified risk areas is carried out with a view to following up measures when necessary.

Results from latest due diligence assessment

Sotra Link AS' two main contractors are in place, and we have a steady and good dialogue with them. In addition, the company has about ten other smaller suppliers of consulting services. These mainly consist of Norwegian-established and reputable companies with their own routines in this area.

The due diligence assessment has shown that our greatest risk areas relate to the supply chain for some building and construction materials and larger structures with possible prefabrication abroad. These can have complex and fragmented supply chains, which provide limited traceability and transparency, increasing the level of risk of poor working conditions and human rights violations. This is particularly true at the lower stages or raw material stage of the supply chain, for example related to metal imports from geographically high-risk areas. Sotra Link AS is aware of this risk, and which we pay particular attention to in dialogue with our main contractors.

This statement is for the period 1 July 2022 to 30 June 2023. However, it is emphasized that due diligence and work on human rights and working conditions are continuous work in the company, and we have several ongoing processes in this area.

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Christopher M. Bjerke, CEO

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