

Statement according to the Transparency Act

Sotra Link AS

1. Introduction

This statement has been prepared by Sotra Link AS in accordance with Section 5 of the Transparency Act .

For Sotra Link AS, it is important to run the business responsibly and to contribute to a responsible business community. We fully support and respect basic human rights and decent working conditions in our business, and we expect our contractors, for design and construction, and for operation and maintenance, as well as other suppliers and business partners to do the same. The company carries out due diligence assessments with regard to this.

2. Organisation, operating area and routines

The core business of Sotra Link AS is to manage and finance Norway's largest infrastructure project to date, Rv. 555 The Sotra association, as a public-private partnership (OPS). The company has entered into a PPP contract with the Norwegian Public Roads Administration, and the purpose of the company is to fulfill this contract.

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

The company's head office is located at Knarrevik in Øygarden municipality, in the project area. The company has four permanent employees, as well as consultancy services on contract. The company is owned by Ibsen Investment Holdings Ltd. (Macquarie is "general" partner and John Laing is " limited " partner), Webuild SpA , and SK ecoplant CO. Ltd.

The work to safeguard human rights and decent working conditions is anchored in the company's board and forms part of the company's routines. The work is, among other things, reflected in the company's ethical guidelines, and it is included as part of contract management by our main suppliers. The work is also part of the company's routines when it comes to meeting the requirements set by the Norwegian Road Administration, lenders and Norwegian law. This concerns some extensive requirements, including with regard to safeguarding HSE, working conditions, human rights and risk management. These requirements are again reflected and continued in our agreements with our main suppliers.

The overall responsibility for safeguarding the duties under the Transparency Act rests with the company's board, while the practical responsibility for the day-to-day follow-up rests with the CEO and other employees in the company. The HSE manager also has an important role in the work, in connection with the daily follow-up of our main suppliers' routines to safeguard HSE, working conditions and human rights in their operations and among their subcontractors.

Our office is located in the project area, and we have regular contact with employees in various roles at our main suppliers and their subcontractors. Among the employees of Sotra Link AS, there are short lines and a good flow of information. Both parts provide an advantage in working with the Transparency Act . In case of suspicion of actual or possible violations of human rights or decent working conditions in the business or the supply chain, this can be reported through our notification channels, among other things.

3. Conditions and measures in own business

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

In general, the risk of accidents and injuries is considered to be small in Sotra Link AS as a result of the nature of the work, and no serious work accidents or accidents have come to light or been reported in recent years in Sotra Link AS. HSE is a high priority, and our work in HSE is constantly being strengthened.

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

4. Assessments, conditions and measures in 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 into new supplier relationships, an assessment of the supplier is carried out. This means, among other things, that references are obtained, as well as that you carry out your own searches and assessments. Furthermore, we are involved in and participate in the approval process of subcontractors to our main supplier and regularly receive risk assessments from the main supplier, see further discussion below. Our agreement with our main supplier sets strict requirements for safeguarding human rights and working conditions both at the supplier itself and at the supplier's subcontractors.

In addition to the assessments before entering into and during supplier relationships, the company carries out at least once a year a more general survey and assessment of the risk of actual and potential negative consequences for basic human rights and decent working conditions in the business, the supply chain and among business partners. Further assessments are carried out continuously throughout the year if information is received indicating that it is required or the conditions otherwise indicate it. The most recent overall assessment was carried out in the spring of 2024.

Our assessments are based on a separate guide and based on a range of sources, including the information we have acquired about the supplier and the risk assessments received from our main supplier. Among the risk elements, industry risk and geographical risk are particularly central. Based on the general mapping of risk, a closer assessment is made of any identified risk areas with a view to follow-up measures when necessary.

5. Results from the latest due diligence assessments

Sotra Link AS is a company that has a core business, where the main suppliers are determined, and we have a regular and good dialogue with them. The company has two active main suppliers (respectively engineering and construction, and operation and maintenance of Rv. 555 Sotrasambandet) and four business partners, who are owners of the company. In addition, Sotra Link AS has approx. ten other smaller suppliers of consulting services. These mainly consist of Norwegian established and reputable companies with their own routines in the area.

Over the past year, the Norwegian Labor Inspection Authority has carried out inspections of both our main supplier and their subcontractors. Here, some breaches of laws and regulations relating to the working environment and working conditions have been uncovered, which Sotra Link AS has followed up by closing non-conformities in accordance with the contract, and our systems. These conditions are also included in our further due diligence assessment, and affect our risk-based follow-up.

Sotra Link AS is involved in and informed about major procurement processes and primary subcontractors to Sotra Link Construction JV ANS, and regularly receives results of Sotra Link Construction JV ANS's risk assessments of these, as part of the follow-up of the supply chain. Sotra Link Construction JV ANS is also subject to the Transparency Act and has published its own account of this on our website, as they do not have their own website since their only project is to carry out the Sotra Sambandet for Sotra Link AS.

Sotra Link AS participates in inspections when necessary, and together with the Norwegian Public Roads Administration has access to the results of Sotra Link Construction JV ANS's inspections of its subcontractors. Sotra Link AS also participates in the approval process of suppliers, where Sotra Link AS, and also the Norwegian Public Roads Administration, have the opportunity to reject or dismiss unscrupulous actors. This is work that Sotra Link AS takes very seriously.

Our surveys and assessments show that our biggest risk areas relate to:

- The supply chain for certain building and construction materials, larger constructions with possible prefabrication abroad before assembly in the project and technical components. These may have complex and fragmented supply chains, which provide limited traceability and transparency, which increases the risk level of poor working conditions and violations of human rights in the supply chain. Here, certification and independent control are important tools to avoid unscrupulous actors.

- Purchasing at the raw material stage of the supply chain, for example related to metal imported from high-risk geographical areas. Here, steel production is a main risk .
- Salary and working conditions in certain industries within construction activities. There are certain industries which have historically had incidents of breaches of pay and working conditions, and which also through controls carried out by Sotra Link Construction JV ANS have uncertainties related to this. This is followed up both before , during and after the execution of work in the project to ensure that this is uncovered, informed about and corrected when there are breaches of regulations in our supply chain.

These are risks Sotra Link AS is aware of, and to which we pay particular attention, in dialogue with our main suppliers, who mainly carry out the checks and obtain documentation. This dialogue and openness also ensures that identified breaches are followed up and closed, and that unscrupulous actors are shut out of the project if breaches are discovered.

Furthermore, HSE, pay and working conditions, and working conditions during the building work are areas that are a high priority for us. Through dialogue, system reviews and random checks, Sotra Link AS helps to uncover deviations and undesirable conditions, which are followed up and learned from, in order to avoid similar incidents in the future. A larger number of subcontractors for the main contractor in this phase of the project also results in an increase in deviations, which in turn leads to Sotra Link AS in accordance with the contract requiring action from our main contractor for these deviations.

Sotra Link AS is concerned that all incidents and near-misses within HSE must be reported, for further learning to avoid accidents in the project. We work for a low threshold for reporting, and want to give a comprehensive and truthful picture of the situation in the project.

This statement is for the period 1 July 2023 to 30 June 2024. It is emphasized, however, that due diligence assessments and the work with human rights and working conditions is a continuous work in the company, and we have several ongoing processes in this area.

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