

A Statement
to the Norwegian Transparency Act





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1 General Information

1.1 Company

Sotra Link Construction JV ANS (hereinafter referred as "SLCJV" or "We") is a partnership company, registered in Valaskiftet 6, 5355 Knarrevik on the 8th of March 2022 with the Organisation No. 928 890 961, established by 3 partners which are FCC Construcción S.A., Webuild S.p.A, and SK ecoplant Co., Ltd., to perform Rv.555 Sotrasambandet project in Vestland of Norway, which will improve traffic condition between Øygarden and Bergen building new roads, tunnels, and bridges.

FCC Construcción S.A. has 35% of the participation of interest and is a world leader in construction, with extensive experience accumulated over its 120 years of history. Their activities cover all areas of engineering and construction, and they are the benchmark for civil works (roads, railways, airports, hydraulic and marine works, tunnels, and bridges) and residential and non-residential building works such as hospitals, football stadiums, museums, and offices.

Webuild S.p.A. has 35% of the participation of interest and is a global construction player that specialises in building large and complex infrastructure projects for sectors such as sustainable mobility, hydroelectric energy, water, green buildings, and tunnelling. They have 115 years of applied engineering experience on five continents and 70 000 staff from over 100 nationalities.

SK ecoplant Co., Ltd. has 30% of the participation of interest and is a Korean construction & eco-business company, former name of SK Engineering & Construction Co., Ltd., has contributed to stakeholders' happiness through diverse construction projects, such as plants, infrastructure, buildings, and housings, and industrial development at home and abroad in the past 44 years since its establishment in 1977.

1.2 Clients

Statens Vegvesen (NPRA, the Norwegian Public Road Administration) is the ultimate client of this project is a Norwegian government agency responsible for national road networks, driver training, vehicle inspection, and subsidies to car ferries. They strive to ensure that the road transport system in Norway is safe, sustainable, efficient, and available to all. They manage national roads on behalf of the national government and county administrations, this involves planning, developing, operating, and maintaining the roads.



Sotra Link AS is a direct client of SLCJV. It has been granted a concession agreement for this project from Statens Vegvesen. It is a limited liability company consisting of 3 investors, which are Macquarie Capital, SK ecoplant, and Webuild.

From the top client to the main contractor and its partners, all parties are big players in this field internationally, all of them has high level of experience and management procedure overarching a high standard of ESG (Environmental, Social and Governance) and a strong code of ethics.

1.3 Product and Market

The Rv.555 Sotrasambandet project is a PPP (Public-Private-Partnership) contract, which has a value of 19.8 billion NOK, awarded to Sotra Link AS by Statens Vegvesen. This project is the largest single contract entered into by the Statens Vegvesen of all time. Sotra Link AS will finance, design, build, operate and maintain the road system for 25 years. In this regard the Design and Build work has been awarded to the SLCJV.

SLCJV are performing work to build 9.4 km four-lane road from the intersection with Fv.562 at Storavatnet in Bergen to the junction with Fv.561 at Koltveit in Øygarden municipality. The Sotra Link bridge and tunnel system will feature 19 roads and pedestrian underpasses, 23 tunnel portals, 22 bridges and viaducts, new four-lane motorways and 14 kilometers of pedestrian and bicycle paths. Approximately 24 kilometers of two-lane access roads will also be built.

The main bridge will be 30 meters wide and 900 meters long, with towers 145 meters high. The Drotningstvik Tunnel, which will be nearly 2 000 meters long, will have junctions and ramps to Drotningstvik. The Harafjell Tunnel will be reconstructed and there will also be three tunnels for pedestrians and cyclists at Janahaugen, Kiplehaugen and Harafjellet.

The products and services we provide detour areas of heavy congestion will resolve bottlenecks and improve traffic safety for road users. It is scheduled to open to traffic on 1 June 2027.

The markets in which we operate is Norway where the work site is located. The physical work will be done in Øygarden – Bergen area and the majority of design consultants and build subcontractors will be from near local area or other part of Norway such as Oslo.

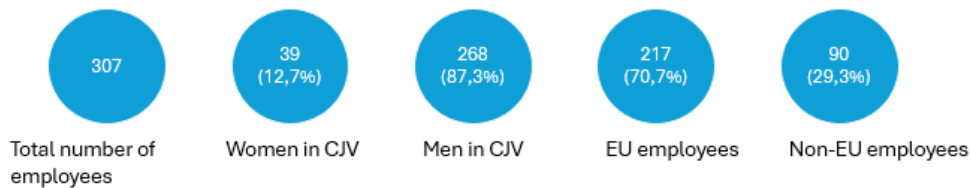


1.4 HR key facts and numbers

SLCJV is structured into five different departments, with different sub-departments. The departments are Project Management, Commercial, Admin Finance Control, Operations and Construction. Each department has managers on several levels who are responsible for following up the employees.

SLCJV is a multinational company with employees with 48 different nationalities from Europe, Asia, Africa, North and South America. The employees of the company origins from Albania, Argentina, Austria, Brazil, Bulgaria, Chile, China, Costa Rica, Croatia, Cyprus, Czech Republic, Egypt, Ethiopia, Finland, France, Georgia, Germany, Great Britain, Greece, Hungary, Iceland, India, Iran, Ireland, Italy, Kenya, Korea, Latvia, Lebanon, Lithuania, Mexico, Montenegro, Nepal, Norway, Pakistan, Philippines, Polen, Portugal, Romania, Russia, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey and USA. Approximately 70% of the employees are coming from a country within EU, while about 30% are from countries outside of EU.

Some key numbers regarding employees directly in CJV:



2 Human Rights and Working Conditions

2.1 Commitments

Since we established the Company in 2022 and the Transparency Act came into effect in the same year, we have done our best to fulfill the Act, hence, we have implemented noteworthy measures. Through these measures, there are implemented further tools and steps in the performance of the company's due diligence. The due diligence process throws up a lot of information on the target company/contractor/supplier, across all its operational areas, which CJV then review and piece together all this information to a coherent story. This information will serve the procurement of a company and could affect the initial opinion on a deal. But the information and outcome will also serve further departments in the performance of measures, due diligence, audits, and risk assessments.



CJV have implemented a code of ethics, code of conduct for suppliers and HR policy which covers vast topics related to its employees and society. In these documents, we clearly state that it ensures working condition respectful of human rights and fully rejects any form of illegal, child, forced labour, or practices that constitute modern forms of slavery and human trafficking. Moreover, it is clearly mentioned that all employees will have respectful working condition abide by the Norwegian law standard.

And we have put in place "Integrated Management System for Quality, Environment, Sustainability, Safety and Health" at work. Our management is committed to achieving zero accidents with reference to environment, and health and safety and zero non-conformities with reference to quality. The policy defines actions to fulfill the Environment and Sustainability and actions to preserve workers' safety.

Considering the business area covering this topic is vast, CJV have key personnel in different departments who then report monthly to a project director of SLCJV. Departments' managers, who will report on subjects related to human rights and working conditions are such as HR, HSE, Procurement, and Communications, CSR management and so on. For CSR work and for overseeing the transparency act topics, CJV have their own key personnel that operates as a team leader for the CSR department. In this field topics such as onboarding of contractors, assessments for and of contractors, audits etc are performed and overseen. The CSR key personnel reports directly to the "project manager stakeholders", who oversees departments such as CSR, communication, general services, permits, IT, translators and traffic management. This keeps a good cooperation and communication both within CJV but also publicly.

In addition to the above, SLCJV, also in a Sub-Clause 35.2.2 of a contract with the client, committed to conduct regular risk assessments to prevent infringements of fundamental human rights and the ILO's core conventions in its own operations and in the supply chain. Therefore, our Board of Directors and management have clearly acknowledged the importance of this topic.

Through 2024 and after the workshops performed with our advisory company last year, CJV have worked tirelessly with assessments, routines, cooperation between procurement and CSR, due diligence processes and procedures and identifying new risk factors with clear mitigations.

CJV have primarily focused on the assessments of companies and suppliers that are been



directly involved with work on site, connected with the project RV555 Sotrasambandet. And through these assessments there have been performed audits and checks, that have resulted in deviations and thereafter specific mitigations, such as contract changes, work hour arrangements and back pay. There have been two cases where a contractor has been stopped in their work.

For contracts with companies, suppliers, and assistants outside of Norway and not directly in the project itself, CJV have also brought them into the assessment. Although the assessment is the same regardless of the company, the mitigations and requirements can differ. An example would be suppliers or companies outside of Europe and possibly in a category of high risk, the requirements would be far more and would be assessment between different departments together.

In 2023, CJV had visits and audits from the labour inspector. Here there was detected several breaches of the working environment act and other.

Direct violations regarding, working hours, employment contracts, working conditions at the office space and routines regarding whistleblowing.

CJV assess the orders from the authorities and set about with direct mitigations. This included new updated contracts, more direct guidelines for working hours, built and improved changing rooms and toilet facilities.

CJV also then involved the occupational health service, FALCK, to perform employee surveys to assess the situation of psychosocial topics and organization topics. And on the back of this, then performed and produced sufficient risk assessments of the psychosocial areas and organizations areas, within CJV and for the working environment committee.

On the side of all this risk assessment and ongoing work, CJV also involved PWC (price Waterhouse Coopers) to perform different interviews and investigations of the employees. Based on the outcome of this, CJV started more direct mitigations. These mitigations included updates of employee contracts, mentor scheme for new employees, more updated onboarding process, more and sufficient divide of departments, new employees, and new positions to embrace the need, and on a more serious note some managers were released from the position and the project.

2.2 Whistleblowing and Complaint Mechanism

Given by a legal frame of the Work Environment Act, part 2, we have implemented the Whistleblowing procedure. This procedure defines the process of handling of reports and



potential investigations arising because of such reports, due to information regarding behaviours and actions that do not comply with our Code of Ethics and with possible violations or misconduct that could negatively impact its business or cause reputational damage to the project.

In particular, the report's topic shall be based on the violation or to the presumed misconduct, referring to for example:

- Acts of corruption and fraud
- Workplace health and safety violations
- Environmental violations
- Violation of human rights, in relation to respect of diversity and inclusion, and rights of local communities
- Accounting violations in relation to financial flows or money laundering
- Market manipulation and insider trading
- Theft or improper use of company resources and assets
- Violation of the privacy and confidentiality of data and information
- Conflicts of interest
- Violations in the procurement phase and unfair competition

Once reports or information received by the CJV Compliance Function (hereinafter referred to CCF), through various channels such as email addressed to an independent compliance officer or to the project management, or post etc., a case will be dealt by following procedure:

1. Analysis

The CCF shall assess their contents and carry out a preliminary screening, promptly detecting, where possible, the groundless, defamatory and/or offensive reports. In such instances, the CCF shall immediately file the report. Moreover, the CCF, in the event of circumstantial reports, shall ask the whistleblower to provide more information.

2. Investigation



The investigation process mainly aims at confirming the truthfulness of the information under investigation. It provides a precise description of the ascertained facts, through audit procedures and objective investigation techniques. Access to specific information (e.g. documents and e-mails), even if stored in devices that are corporate assets (e.g. PC, phones and external HD), is permitted in some cases and violates privacy at the same time in other contexts.

3. Assessment and final outcome

For each investigation, the CCF shall prepare a final report which includes at least ascertained facts, collected facts and causes and shortcomings that allowed the reported situation to occur.

If the report is grounded, the CCF shall activate the relevant governance bodies and/or control bodies to carry out the most appropriate mitigation measures, which include:

- Amendments to the CJV procedures;
- Amendments to the organisational structures, processes and/or supporting corporate tools;
- Return or require the restitution of any potential improper benefit;
- Disciplinary measures in respect of employees;
- Measures against the 3rd parties (e.g. termination of contracts, partnership agreements, etc.)

The Project Director is responsible for the execution of the disciplinary measures and the action plan submitted by the CCF, except in cases where the Project Director is directly involved in the reporting. In such cases, it is the Executive Committee that is responsible for such actions.

4. Filing

The CCF shall file all documentation. It shall provide results to the Project Director and the CJV Steering Committee on an annual basis, by preparing and presenting a summary report that contains the following information:



- The number of whistleblowing reports received;
- The number of whistleblowing reports substantiated;
- A breakdown of the reports by category; and
- The status or outcome of the reports.

We guarantee that we will not disclose the whistleblower's identity. Maximum confidentiality is, as far as possible, guaranteed with respect to individuals and facts included in the report, and, for this purpose, are employed appropriate communication methods suitable of safeguarding the identity and the honorability of the people mentioned in the report, avoiding, in any case, communication of data acquired to third parties not involved in handling whistleblower's reports.

3 Risk Assessment

3.1 Identification and Prioritisation of Risks

To conduct a step-by-step risk assessment, we decided to approach from at the high-level to an in-depth level from an overall risk mapping, which is categorisation of suppliers by their intrinsic risks. Then we prioritise suppliers based on severity of risks. After finding out the high-risk group, we will conduct a in-depth risk assessment to mitigate the risks. And finally, we conduct mitigation activities such as due diligence and proper measure for the finding.

Based on the events and circumstances in 2023, CJV then had a new assessment of the overall risks and categories. And the contents of each category, since CJV had both a workforce on site performing manual labour and construction management. Therefore, there is now added and then divided into new categories such as own workforce and construction management.

To map our overall risks, we have conducted categorization of suppliers we are confronting and considering the nature of our business they have been categorised by 10 types of suppliers.

1. Own workforce
2. Construction and installation on site
3. Construction administration
4. Key materials



5. Construction equipment
6. Field surveys and tests
7. Staffing and professional services
8. Facility management
9. Office supplies and general equipment
10. Software

After categorisation of suppliers, to understand each risk in detail, we have analysed information of 10 types of risks each as follows:

Category	Risk information
Own workforce	The construction industry is at risk of social dumping and work-related crime, as well as HSE risks such as work accidents.
Construction and installation on site	Containing workforce on site, from CJV, suppliers, contractors etc. In several professions within construction, migrant workers are subject to social dumping.
Construction administration	Contains primarily, CJV admin on site and visiting site, but can also contain visitors, auditors etc. Risk may vary based on sub-category, but is mainly related to low wages, overtime and HSE in labor-intensive lines of work
Key materials	The raw material extraction phase poses the highest risks, such as forced labour and child labour in extraction of metals and minerals.
Construction equipment	Construction equipment can consist of heavy machinery, vehicles, and consist of metals and electronic components, which are considered by DFØ (The Norwegian Agency of Public and Financial Management) to be high risk product categories.
Field surveys and tests	Field surveys and tests can be considered as professional services and have lower risk of human rights and labour violations.
Staffing and professional services	Low risk of human rights and labour violation within professional services such as accounting, legal, tax, engineering etc.
Facility management	Facility management can involve services such as maintenance, construction and renovations. There are risks associated to this category, such as frequent use of temporary/hired workers who are subject to labour rights violations in Norway.
Office supplies and	Office supplies, furniture, cars and IT-hardware are all on DFØ's High



general equipment	Risk list of product categories with systematic documented high risk of human rights abuse occurring in the supply chain, meaning the value chain from raw material extraction to component production until finishing assembly.
Software	The Softwar-as-a-Service (SaaS) sector potentially gives rise to human rights violations regarding privacy infringement of end-users and employees.

To manage risks in effective manner, we have prioritized 10 categories of suppliers identified in the previous step, based on the scope (How many people could be affected by the adverse impact?), scale (How serious would the adverse impacts be for the victim?) and remediability (Will remedy restore the victim to the same or equivalent position before the harm?).

Combining likelihood of risk occurrence to the severities, we created risk prioritization matrix as follows:

Severity	High			High risk Priority 1
	Medium		Medium risk Priority 2	
	Low	Low risk Priority 3		
		Low	Medium	High
		Likelihood		

Based on various discussion sessions and internal surveys, we have mapped our 10 risk categories into 3 risk groups.

- **High risk group**
 - ① Key Materials, ② Construction and installation on site, ③ Construction equipment
- **Medium risk group**
 - ① Field surveys and tests, ② Office supplies and general equipment, ③ Facility management, ④ Construction administration ⑤ Own workforce
- **Low risk group:**
 - ① Software, ② Staffing and professional services

For the High-risk group suppliers, it shall be done a in-depth risk assessment, this process



is performed within the due diligence work from procurement, CSR, HR, construction and HSE within CJV.

CJV felt the need to move the own workforce to a higher level of risk group, than the low group from 2022. This based on the events and mitigations put into place after autumn 2023, with the labour authority audit in mind. Although CJV now have heavy and specific mitigations in place to prevent risks for own workforce, such as a collective agreement, environmental committee, safety representatives and employee representatives, there are of course different factors that can raise the risk for this group through the course of the year. These risk can be such as working hours, travels, the size of the project, colleagues outside of CJV and so on.

Procurement has a step-by-step procedure to follow when procuring and dealing with new contracts. This can be in different steps and the evaluation is performed within a flow chart based on the process, input and output and the risk category.

One performance of evaluation is performed through a excel form, and is for subcontractors, manufacturers, and suppliers. This form evaluates the topics Organization, Information management, HSE, Quality and Schedule & delivery. Within each category one can obtain up to 5 points. At the end a classification is given based on the gained average points. The class is as shown below:

Class based on gained Average points					
CLASS	A	B	C	D	E
AVERAGE RANGE	4,3-5,0	3,5-4,2	2,7-3,4	1,9-2,6	1,0-1,8
	Suitable			Conflictive	Banned

CJV have not yet seen an outcome from the procurement process, where a form has ended below the class of C. This evaluation is performed of each contract every six months.

The outcome of these evaluations is informed to project director, CJV management and CSR, for further assessment and mitigation within the different areas.

3.2 Risk Assessment System & Process

Since we are implementing overall risk mitigation measures, here we specify a risk assessment system & process covers most of the risk categories listed in 3.1.

Risk assessment CJV company based

On the back of the work performed by PwC, Falck and CJV regarding the audit from the



labour inspector, there was detected 4 different risk areas to be assessed. These are, psychosocial work environment, organizational assessment, work on site and site visits. These assessments are implemented into CJV and are available for all employees, the different mitigations are implemented into everyday routines, and are informed within the HSE induction and onboarding processes.

It is also important to note that this work is and has been overseen and performed directly through the working environment committee on a yearly basis or more often if needed.

To also comply with HSE regulations, CJV perform risk assessments of HSE topics and risks within the company and project. It is the HSE department who oversee these assessments, and therefore keep them updated and available.

These assessments contain the following areas:

- Office work and administrative
- Psychosocial and organizational factors
- Tunnel work and performance for own workforce in different areas, such as day zone

The risk assessment for performance work on the project site, that are made by our subcontractors, suppliers, and contractors, are also implemented, and taken into account. All risk assessments that are connected to the project are collected and implemented into a overall risk assessment called "Cumulative risk assessment". Such assessments are based on each area of the project, there are 11 different areas with such a cumulative risk assessment. These areas are based on the project and contain such as tunnel work, day zone work and bridge work.

Social Compliance

As a first point of contact with the contractor, contract assistant or supplier, we use the system HMSreg, this can be introduced through the procurement stage, before contract is signed, after contract is signed, but also upon new contracts and addendums. Through this system we perform the onboarding of the relevant contractor, contract assistant or supplier, based on the level of the contract chain, but containing all the contract chain. Each contractor or supplier has a set of documents to deliver, some of them will provide CJV with relevant information to further perform an assessment of the contractor or supplier. From this assessment we will then decide if a further inspection or audit is necessary.



HMSreg is handled by the CSR department, with and through a dedicated resource for supplier intake, but with assistance from both procurement and contract department.

The assessment of each contractor and supplier is performed in Excel. The assessment has a set of 26 different categories that will give us the possibility to assess the company thoroughly. The assessment will give an indicator of a Low, Medium, and High outcome. Green, yellow and red for visualization.

The categories are amongst others based on company information such as tax, organization set up, number of employees, number of foreign employees, number of employees travelling or living abroad and use of agencies. There are other categories based on collective agreements, working hour agreements and the number of sub-sub-contractors or contract helpers.

The assessment has been updated regularly, the first update is performed by CSR recourses and then updated in meetings concerning the topic. Meetings such as CSR meeting for CJV, and CSR meeting with our client. These meetings can affect the assessment based on information received in these meetings.

Based on the assessment, CJV have then performed inspections if necessary. These inspections and audits will and have been performed in the manner below:

- Wages and working conditions audit
- Accommodation inspections
- Company based audit
- The right to use agencies
- Evaluation of workplans and progress plans

When performing this type of inspection and audits, we have produced a set of checklists to use for the appropriate audit. The requirements and checklists that are used, are shown to other parties, that can help to promote and improve the content. Third parties that can provide such comments are the labour authority, trade unions, solicitors, client, and an organization from worker-and businessowner associations (fair play bygg og anlegg).

When performing an audit of wages and working conditions, we will perform this in HMSreg with a checklist through the system. The use of HMSreg helps keep personal information guarded and secured, one point of contact through HMSreg and not through



email, the advantage to pick workers based on performed hours and degree. And a pre performed report after the audit is finished.

When performing an inspection of accommodation this is performed through a checklist in word, based on the information of the accommodation in advance, but this inspection is performed physically at the elected accommodation.

We have also produced templates and base all other audits surrounding this topic within the HMS reg system. Audits regarding collective agreements, internal control systems, company-based audits and etc., are all performed in HMSreg through our own templates.

If there are discovered any deviations in the audit, we will command the contractor or supplier to align with the requirements & regulations, and if necessary, back date mitigations for any deviations.

In a case where the deviations are serious and in detail seem to be performed outside of our scope of work, we have the possibility to inform third parties who work solely of this topic in Norway. Such as "Politiets A-krim, Skatteetaten, Arbeidstilsynet og Fair play bygg".

Another important part of the assessment is to be aligned with updates within law and regulations, but also through news articles that can affect us in any matter.

With updates of laws and regulations the CSR resource has a subscription through lovdata.no, arbeidstilsynet.no and contact with our union NAF.

We also have close cooperation with third parties, that can give us insightful information regarding companies we are dealing with, such information is regarding as confidential information and therefore we use this carefully when assessing companies based on this information.

All these updates and information are saved in the working file, attached to the assessment.

The following key numbers from the risk assessment are as shown below:

Category		Mitigation performed
Contracts in HMSreg	480	
Contracts assessed	400	
Contracts assessed high risk	82	30
Contracts assessed medium risk	150	100



4 Risk Mitigation

In this section, we cover predominantly the Construction and installation supplier category's risks.

4.1 Mitigation Plan

Through the social compliance work, we will be able to detect this type of topics through the following channels:

- Whistleblower
- Dalux system, by registered RUH (Non-conformities or complaints)
- Emails/ complaints from environment
- Information from third parties who have dialogue with us, such as NAF (norsk arbeidsmandforbund), fair play bygg & anlegg, tax authorities, Polities A-krim

When gathering this type of information from other parties the information can affect the assessment given of a company in the social compliance assessment.

By this case we can perform measures based on a new assessment or risk.

We can take measures to prevent, limit or stop such negative consequences. This of course depends on the severance of the consequence or deviation.

We have the possibility both by contract requirements and law to command the following:

- Direct changes in working conditions
- Salary adjustments
- Adjustments to accommodation and living conditions
- Limits in the contract chains and use of agencies
- Direct stop in the contract chains and use of agencies
- Reject the use of a contractor
- Contract adjustments both for workers and sub contractors/suppliers
- Requirements for supplier of materials

These types of measures need to be based on direct information and possibly an audit performed by us.



The requirements of Compliance and Code of Ethics have been included as an annex in agreements with suppliers.

Moreover, relevant clauses of this Act will be added to the contract document templates in order that suppliers comply with the Act and further requests of our audit.

In case we are noticed or informed that a material risk is detected, we are planning to conduct our own due diligence or a 3rd party due diligence.

4.2 Detected Risks and Mitigation Results

So far, we have detected direct deviations based on social compliance that are within our scope and reach, through due diligence and assessments.

Moreover, we have detected indications of negative consequences for social compliance for certain contractors, these are negative consequences based on the following information:

- Companies with tax arrears
- Breach in working hour agreements
- The use of sub-contractors in a chain longer than accepted
- Applications to use sub-contractors that do not contain the correct technical competence
- Missing or lower conditions based on the attached collective agreements

We have applied different measures to stop or limit these direct negative consequences, they are as listed below:

- Limitation in the use of a sub-contractor
- Rejection to use a certain sub-contractor
- Rejection to use a certain supplier
- Changes applied to the given working hour agreements
- Corrected to comply with the collective agreement
- Back pay of salary and other compensations regarding collective agreements

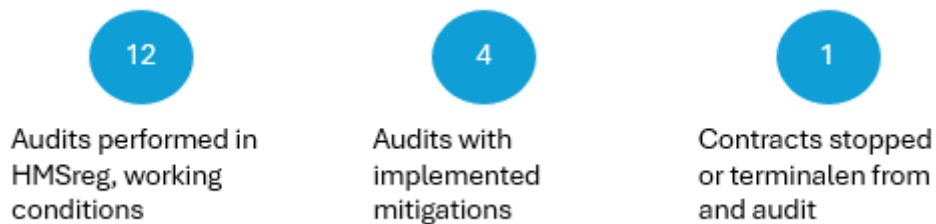


Additional information from the contractor on how they align their work directly to the correct collective agreement.

Due to the nature of our business, we have confronted concerns regarding HSE from the community and nearby neighbors. We are having regular meetings with community members to share our construction plan, hearing opinions from the community and trying to reflect on the opinions as much as possible.

One example of this action is that we detected vulnerabilities of safety of living from our construction work, after having thorough conversations with several families who were affected by the work, finally we had agreed to moving them to safer places.

Audits performed and mitigation implementation is as seen below:



4.3 Proceeding and the way forward

The process implemented for risk assessing suppliers, contractors, and contract assistants, both within CSR and procurement will continue in the manner as today.

Based on the information, experience, and input CJV have gathered since June 2023, the templates and systems used within the due diligence process, will be reevaluated as planned and updated to perform more adhered.

CJV have performed workshops and corporation meetings with an advisory company, with regards to the transparency act, risk management in supply chain, risk categories and mitigations, this has helped with the plan, do, check process CJV have within the due diligence work.

Results and findings in autumn 2023 and spring 2024, have shown that CJV have a large assessment regarding sub-contractors and contract assistants. Based on these assessments, CJV see the risk outcome and quantity of risk assessments to be sufficient,



but also as expected. Audits performed based on the risk assessments have not been in accordance with expectations, CJV see that there should and could have been performed more audits. But this has been obstructed because of manpower and the severity of one specific audit. Therefore the audit and assessment process within the CSR department has been altered somewhat based on the future.

After the outcome within CJV employment, employees and the audits from the labour authority, there has been need for severe changes within the organization. CJV sees this as important and needed, but also as a hindrance or setback in the development process. Something that has taken time to recover from.

But on the other hand, has opened up the organization and improved the communication within the organization. Which can be seen through the whistleblower and complain mechanism, outcomes and changes performed from the working environment committee, new HR resources and managers, use of systems and of course the overall psychosocial work environment.

Audits performed and planned based on the risk assessment will also continue in the manner as of today, within the same extent as the past year.

The due diligence assessment and the different steps of the process are to be evaluated when dealing with contracts that are in the high-risk category. This is something CJV will focus and work more thoroughly within 2024.

Through 2024, CJV have planned more compliance audits with the contract chain, also outside of Norway.

Inquiries about how we work with human rights should be addressed in writing to us by e-mail: communication@slcgv.no . The request will be processed and answered within three weeks of receipt of the information request.



Øygarden, 30 June 2024

Board members of Sotra Link Construction JV ANS

Webuild S.P.A

DocuSigned by:

Luca Polito

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Luca Polito

Sotra Link CJV Chairman

FCC CONSTRUCCION
SUCURSAL NORUEGA

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Carlos Pallares Rodriguez

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Sotra Link CJV

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