

Norwegian Transparency Act Statement FY2025

1. Introduction

Marlink Group delivers managed connectivity and digital solutions to customers operating globally, including remote and complex environments. Both our customers and suppliers are part of a geographically diverse value chain, which increases exposure to varying regulatory frameworks, labour practices, and human rights conditions.

As a result, we recognise that our global operations and value chain may create risks to fundamental human rights and decent working conditions, particularly through engagement with suppliers, contractors, logistics operations, and field services.

This statement is prepared in accordance with the Norwegian Transparency Act and describes Marlink's due diligence activities, findings, and improvement measures related to risks to people during FY 2025.

2. Governance and organisational developments

Responsibility for transparency and due diligence is anchored through cross-functional collaboration between ESG, Legal, and Global Supply Chain/Procurement, supported by management system governance, including risk registers, management reviews, and audits.

a. New in 2025:

A dedicated Risk and Business Continuity Manager was appointed at Group level to consolidate and strengthen the systematic identification, assessment, and management of enterprise risks.

b. New in 2026 (post-reporting reference):

Effective 1 January 2026, Marlink established a CHRO function to enhance oversight and governance of people-related risks across the Group. The CHRO is responsible for the development and implementation of policies and processes relating to employees, including working conditions, health and safety, diversity and inclusion, and grievance mechanisms. These processes constitute a key element of Marlink's due diligence framework for safeguarding fundamental human rights within its own operations.

3. Approach to due diligence and risk assessment

Marlink applies a risk-based approach aligned with internationally recognised frameworks, focusing on identifying and prioritising potential adverse impacts on people.

a. Key findings from 2025

In FY 2025, Global Supply Chain reported no major incidents with significant impact on worker health, safety, or labour rights.

At the same time, overarching structural and operational risks were identified, particularly related to organisational capacity, training, and supplier governance.

There are also indications that changes in the business model and introduction of new equipment and solutions have led to increased workload in certain departments. This is primarily linked to a higher volume of installations and service updates compared to previous periods. While tasks have in some cases become more standardised, the increase in volume has required additional operational capacity. This has been identified as a transition effect, and it is expected that workload will stabilise over time as processes and systems mature.

Monitoring of employee experience and workload is supported through bi-annual employee surveys.

Mitigating actions were initiated, and continued focus is required in 2026.

4. Policies, procedures, and training

Marlink maintains core policies governing ethics, compliance, and human rights, including a Code of Conduct, Supplier Code of Conduct, and whistleblowing framework.

a. Updates in 2025:

- A new ethics policy was introduced
- An updated Code of Conduct was implemented, aligned with recognised frameworks
- A new Code of Conduct training course was launched
- The whistleblowing procedure was updated

All employees were required to complete mandatory compliance training in Q1 2025, strengthening awareness of ethics, human rights, and expected standards across the organisation.

In addition to established policies, Marlink has embedded these principles into key operational processes across the organisation. This includes structured onboarding of customers, suppliers, and employees, where relevant ethical, compliance, and human rights expectations are communicated and acknowledged. Human rights and compliance considerations are also integrated into procurement practices and supplier engagement, as well as throughout the employee lifecycle, including recruitment, performance management, and exit processes. These procedures support the consistent application of policies in practice and strengthen risk identification and mitigation across the value chain.

Training and competency management are supported through internal HR systems and reviewed as part of management system audits.

5. Activities and findings in FY 2025

a. Customer audit (sustainable procurement)

Marlink was subject to a customer-led sustainable procurement audit covering ethics, human rights, labour conditions, and HSE.

The audit confirmed a generally structured approach to safety, training, and operational control across the organisation.

b. Internal audits

There has been performed several internal audits across legal entities and locations within the group covering ISO 9001, 14001, 27001 and 45001 related topics.

The audit confirmed a generally structured approach to safety, security, training and operational control across the organisation.

c. Improvement areas identified:

Differences in governance structures across business units mean that risk is assessed based on the type of business and operational context. As a result, there is limited linkage and alignment across teams, which impacts the overall consistency of risk oversight.

d. Launch of first ESG report

Marlink published its first ESG report available upon request. The report was designed to follow the VSME framework and will be used as basis to evolve towards CSRD reporting in 2027.

6. External ISO 9001, 14001, 27001 and 45001 audit (2025)

An external audit confirmed strong leadership involvement and established governance processes for monitoring and continuous improvement.

Operational sites demonstrated established safety measures, including emergency preparedness and HSE controls.

A minor nonconformity was identified related to internal audit execution at selected sites.

These audits were completed within 2025, and follow-up actions were implemented to strengthen audit planning and execution going forward.

7. Measures implemented and follow-up

During 2025, Marlink continued to strengthen:

- governance and compliance processes
- internal audit planning and execution
- training and awareness related to ethics and compliance

Improvement actions were tracked through internal systems and aligned with findings from audits and operational follow-up activities.

Procurement initiated measures to strengthen supplier governance, improve organisational capacity, and enhance systems and processes.

Additional developments:

- EcoVadis “Committed” recognition received (2025)

8. Remaining risks and improvement priorities

Marlink recognises the need for continued improvement in:

- supplier governance and due diligence processes
- organisational capacity and training coverage
- consistency in risk assessment and oversight across business units
- internal audit execution and follow-up across all relevant sites

Attention will also continue to be given to workload and organisational capacity, particularly in areas affected by recent changes in business model and operational scaling, to support stable operations as transition effects decrease over time.

9. Forward-looking activities (2026 and beyond)

Looking ahead, Marlink has identified several important initiatives:

- Strengthening people-related oversight through the CHRO function
- Continued development of operational risk management and business continuity processes
- Further improvement of supplier governance and due diligence activities

a. CSRD preparation:

Marlink plans to update its materiality assessment in 2026 in preparation for CSRD reporting for FY 2027.

This will include:

- identification and prioritisation of material ESG topics
- establishment of improved baseline data
- strengthening documentation and traceability of assessments and conclusions

10. Right to request information

Stakeholders may request information on how Marlink addresses human rights and decent working conditions through the Group's transparency channel.

11. Declaration

This statement has been prepared with input from ESG, Legal, and Global Supply Chain functions and reflects Marlink's due diligence work under the Norwegian Transparency Act for FY 2025.

Approved by the Board of Directors of Marlink AS on: 12.06.2026