

Norwegian Transparency Act Statement

Date: 17th June 2024

Version: 1.0

1. Introduction

The Marlink Group is the world's leading provider of end-to-end managed smart network solutions that connect people and assets around the globe and in all markets that cannot be reached with conventional connectivity.

As a responsible business, it is essential that we understand, prevent and manage any negative effects on individuals, the environment and society which may occur within our value chain.

This is Marlink AS's first Norwegian Transparency Act Statement and covers the actions taken up to the end of financial year 2023.

2. Approach, Risk Assessment and Due Diligence

We believe our exposure to the risk of human rights issues increases when we engage with third parties, specifically those providing people services.

Following an internal audit and risk assessment, Marlink elected to initially assess trading partners who provide people services across the areas of Field Service, and Information Management.

The findings from our risk assessment highlights that due to the nature of work and operating locations, these trading partners may have increased exposure to human rights risks, including but not limited to:

- Causing harm through poor or unsafe working conditions
- Exploitation of vulnerable groups, including women
- Unethical behavior, including bribery and corruption
- Protection of personal data

Through an industry recognised toolset, subject trading partners are assessed in the areas of:

- Labor and Human Rights
- Ethics and Compliance
- Environment
- Sustainable Procurement

Assessments are tailored to the trading partner and comprise of country and sector specific risks, aligned with frameworks such as the Organization for Economic Co-operation and Development (OECD). Marlink communicates the results of the assessment and cooperates with the trading partner in remediation when appropriate.

3. Policies, Procedures and Governance

Marlink has established a set of core policies and procedures which provide a framework to enable the management of business risk, including the risks posed by improper Human Rights due diligence.

4. Marlink Group Code of Conduct

The [Marlink Code of Conduct](#), based on the principles of the UN Global Compact and UN Women's Empowerment Principles, applies to all employees (whether permanent, fixed-term or temporary), including consultants and contractors.

The Marlink Code of Conduct helps provide valuable guidance on the most common ethics and compliance issues that we encounter in our business operations.

5. Supplier Onboarding Process

It is the objective of Marlink to ensure appropriate screening and due diligence occurs when onboarding suppliers. To support this, Marlink has established a supplier onboarding process to enable:

- The evaluation of potential suppliers
- The identification and mitigation of risk
- Obtaining approval to onboard a supplier

6. Supplier Code of Conduct

The Marlink Supplier Code of Conduct, based on the principles of the Marlink Code of Conduct, is provided to suppliers during their onboarding process. This allows Marlink to communicate its commitment to ethical and lawful business practices and standards.

7. Whistleblowing

The Marlink Whistleblowing policy sets out the framework for raising allegations of illegal, unethical and/or improper conduct.

The policy applies to all Marlink employees (whether permanent, fixed-term or temporary), consultants, contractors, or any other person associated with us, or carrying out work on our behalf.

The policy is intended to assist individuals who believe they have discovered illegal, unethical, or improper conduct.

8. Auditing

Through internal and external management system audits, Marlink assures conformity with its objectives to:

- Comply with legal and regulatory obligations
- Meet the requirements of our stakeholders
- Establish policies and procedures that meet the needs of the business
- Enable continual improvement

9. Training

All employees are provided with a copy of the Marlink Code of Conduct which includes information on Human Rights and how to report concerns. Mandatory training on Ethics & Compliance is provided to all employees via the Marlink Training Academy.

10. Continual Improvement

We recognise that human rights risks may change overtime as the operating context of the business evolves. To respond to these challenges, Marlink will periodically review its risk exposure and expand trading partner due diligence, enhance stakeholder engagement, and maintain transparency within its value chain.

11. Right to Request Information

The Transparency Act includes the right to request information on how Marlink addresses Human Right's issues within its supply chain.

To support this requirement, information can be requested by using the '[Get in touch](#)' form on our website.

We will not share your Personal Information with any third party and your Personal Information will be kept confidential, unless you consent to disclosure or when we are required by law to disclose. By contacting us, you agree to the collection, use, and storage of your Personal Information provided to us to allow us to respond to you. If you have any remarks or complaints regarding the way we process your Personal Information, we invite you to email our Data Protection Officer at dpo@marlink.com

12. Declaration

This statement has been prepared by Marlink Group ESG, Legal and Supply Chain teams. In my position as Chief of Staff for the Marlink Group, I can confirm that this statement is representative of the actions taken to comply with the Norwegian Transparency Act in financial year 2023.



Stein Anderssen

Marlink Group Chief of Staff