

## 2024 Norwegian Transparency Act Statement

### Introduction

Marlink AS (Marlink) and its subsidiaries—are committed to treating all workers with respect and dignity, ensuring safe working conditions, and operating ethically. We stand against all forms of human rights abuses and actively work to prevent them from taking place in our supply chains and business operations.

Our Code of Conduct details our commitment to respecting human rights, including the right to freedom from slavery. We expect all who work with us—employees, suppliers, and contractors—to comply with our Code of Conduct. Our Company Code of Conduct requires that our employees and members of our extended workforce abide by all applicable laws, including those preventing modern slavery. We expect all suppliers to follow our Supplier Code of Conduct, which prohibits modern slavery, and we evaluate supplier performance against the Supplier Code of Conduct each year.

We are issuing this statement pursuant to the Norwegian Transparency Act, which requires Marlink AS to publish an annual statement disclosing its efforts to conduct human rights due diligence in its supply chains and business operations.

Marlink’s human rights due diligence efforts are a collaboration between teams across the Marlink Group, including its subsidiaries. Accordingly, this statement is based on activities conducted by Marlink and covers our 2024 financial year (January 1 – December 31, 2024).

For the purposes of this statement, “Marlink,” “the company,” “we,” “us,” “our,” and similar terms refer to Marlink, its subsidiaries, and its controlled entities, unless the context indicates otherwise.

“Modern slavery” refers to slavery, servitude, forced or compulsory labour, child labour, and human trafficking. Additionally, “supplier managers” refers to employees managing our suppliers, and “our extended workforce” includes supplier employees, temporary workers, and contractors.

We did not identify any human rights violations in Marlink AS’s operations or supply chain in 2024.

### Structure, business, and supply chain

Marlink is a wholly owned subsidiary of Venga Topco S.à. r.l. At Marlink, we operate in various demanding and remote environments, including merchant vessels, cruise ships, humanitarian missions, offshore and onshore rigs, and superyachts. We provide communications and technology solutions designed to integrate seamlessly within your operations.

We combine our field engineering resources and expertise with advanced digital technologies, including cyber security, IT, and Cloud enablement. We design, build, and

manage technology-agnostic network solutions, unifying satellite, terrestrial, and digital services into dependable solutions. Our end-to-end managed services aim to provide you with confidence and peace of mind in your operations.

Our revenue generation and core products are based on a comprehensive suite of end-to-end managed solutions, including Connectivity, Network, Cyber Security, Cloud & IT, IoT & Apps. These solutions are supported by our professional services, global operations and delivery capabilities, and local support teams. We are committed to continuous innovation and the development of new products and features to benefit our users, partners, customers, and communities.

Our business is supported by significant technical infrastructure, including data centres located worldwide. We rely on our suppliers for the manufacturing of finished products, the design of certain components and parts, and the distribution of our products and services. Our human rights efforts involve collaboration and engagement with our global suppliers, adhering to our philosophy of partnership with all suppliers.

## Commitment to ensure human rights through Policies and Procedures

Marlink is committed to human rights, including the United Nations Guiding Principles on Business and Human Rights (UNGPs). Our executive committee's vision of being possibilists highlights Marlink's goal to "develop services that deliver possibilities anywhere." This vision continues to guide all of us at Marlink, and we take great care to ensure our products and services take a possibility-first approach and are made responsibly.

To fulfil our mission, we conduct our business in accordance with internationally recognized human rights standards, including the core conventions of the International Labour Organization (ILO) and the OECD Guidelines for Multinational Enterprises. These frameworks guide our commitment to ethical conduct, decent working conditions, and respect for human rights across our operations and supply chains. Depending on circumstances, we also consider other international human rights instruments.

- The Marlink Group Code of Conduct states that employees must respect and protect the privacy of employees, customers, suppliers, and partners, and comply with obligations resulting from European regulations such as GDPR. It also commits to a work environment free from human trafficking and slavery, including forced labour and unlawful child labour. Additionally, it prohibits discrimination and harassment based on protected characteristics.
  - The Marlink Group Code of Conduct encourages employees to report concerns through normal business channels, such as managers, HR Business Partners, or the Legal Team. Confidential reporting can be done through [people@marlink.com](mailto:people@marlink.com).
- The Marlink Group Supplier Code of Conduct reflects principles based on the UN's 10 universally accepted principles in the areas of human rights, labour, the

environment, and anti-corruption, derived from the UN Global Compact. It commits suppliers to a work environment free from human trafficking and slavery, including forced labour and unlawful child labour.

- The Supplier Code of Conduct requires suppliers to sign and comply with its principles, ensuring that Marlink's business relationships are based on integrity and sustainability. The 2024 Procurement Policy mentions that all suppliers must sign the Supplier Code of Conduct.
- The Supplier Code of Conduct defines modern slavery, including forced labour and unlawful child labour, and commits suppliers to a work environment free from these practices. It also outlines the responsibility to uphold health and safety standards across the extended enterprise.
- The Supplier Code of Conduct requires suppliers to comply with laws and regulations regarding conflict minerals and to source materials from environmentally and socially responsible sources. Suppliers must exercise due diligence regarding the source and chain of custody of these minerals and make due diligence measures available to Marlink upon request
- The Supplier Code of Conduct also includes a whistleblowing procedure for reporting concerns confidentially.

## Governance

The UNGPs emphasize the importance of embedding commitment to human rights across a company's relevant business functions, policies, and procedures. Furthermore, our Quality & ESG team is a central function that help ensuring that we are meeting our commitment to the UNGPs, Global Network Initiative Principles, and other civil and human rights instruments across Marlink. The team works in close collaboration with the HR team, Procurement team, Field Service teams and the Legal team.

In 2024, our HR department, Legal department, Procurement department, and Field service teams in EEG and Maritime assessed and addressed own risks to the Marlink group. This comprehensive approach ensures that human rights risks are managed effectively across all areas of our operations.

- The HR department plays a crucial role in monitoring and enforcing human rights policies within the organisation. They ensure that all employees are aware of and comply with our human rights commitments, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.
- The Legal department provides essential support by ensuring that our human rights policies are aligned with internationally recognised instruments and that we comply with all relevant legal requirements. They manage corporate housekeeping, support customer contracts, and oversee compliance processes, including export control and trade compliance. The legal team also handles any claims and litigation related

to human rights issues, ensuring that we address these matters promptly and effectively.

- The Procurement department is responsible for managing our supplier relationships and ensuring that they are evaluated based on modern slavery risks. They work closely with suppliers to ensure that they adhere to our Supplier Code of Conduct and other relevant policies. The procurement team also conducts regular assessments of suppliers to identify and mitigate any potential human rights risks.
- The Field service teams in EEG and Maritime are on the front lines of our operations, and their input is vital in assessing and addressing human rights risks. They provide valuable insights into the working conditions and challenges faced by field engineers, helping us to develop targeted action plans and resources to manage these risks effectively.

Together, these departments form a cohesive and comprehensive approach to human rights risk management at Marlink. By working collaboratively, they ensure that human rights issues are addressed consistently and that we continue to uphold our commitments to ethical business practices and the protection of human rights across all areas of our operations.

## Human Rights Due Diligence

The types of human rights issues and our responsibilities related to them vary across our products and services, as well as the markets in which we operate. Accordingly, an advanced system of ongoing human rights due diligence is essential to effectively meet these commitments and responsibilities. This continuous process is carried out by several teams at Marlink.

## Our operations

Marlink's Company Code of Conduct sets forth our foundational expectations for employees and members of our extended workforce regarding privacy, security, freedom of expression, discrimination, harassment, corruption, and compliance with all laws, including anti-modern slavery and human rights legislation. The Code encourages employees to raise questions or concerns and to report suspected violations. We are committed to maintaining a culture that encourages employees and others to report concerns related to violations of our Code of Conduct, policies, or laws, including our human rights commitments. That is why we have adopted and promoted our whistleblowing policy, which prohibits retaliation of any kind for raising such concerns or for participating in an investigation relating to such concerns.

### *Our direct employees*

The Compliance Program training initiative within Marlink educates employees about human rights and how they can escalate concerns via the correct channels for further review. This training ensures that all employees are aware of their responsibilities and the

importance of adhering to our human rights policies. Additionally, 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.

#### *Our Field Service teams*

Field service roles across Marlink, including those in the Maritime and EEG teams, are considered higher risk due to the nature of the work and the environments in which they are carried out. This classification informs our approach to training, oversight, and risk mitigation.

All internal field engineers participate in Marlink's mandatory corporate training programs, which include Ethics & Compliance and Environmental Awareness modules. These are delivered through the Marlink Training Academy and are designed to promote a shared understanding of our human rights commitments and compliance expectations. In addition, engineers receive training aligned with local legislation, including Health, Safety, and Environment (HSE) and risk management relevant to their responsibilities.

External partners are not enrolled in Marlink's internal training programs but are required to complete essential fit-to-work training, including HSE and technical modules, to ensure safe and compliant operations.

For both Maritime and EEG operations, country risk assessments are conducted centrally. All personnel have the right to decline assignments in areas they consider unsafe. Operational processes such as task assignment, incident reporting, and documentation are supported by internal systems. Feedback mechanisms are in place to monitor performance and support continuous improvement.

We did not identify any human rights violations in Marlink AS's operations in 2024.

#### *Our Supply Chain*

In 2024, Marlink AS worked with a selection of tier 1 suppliers based in several countries. These suppliers provide a variety of equipment, including connectivity solutions, network hardware, and cybersecurity tools, which serve critical functions in supporting Marlink's remote operations across maritime, energy, and humanitarian sectors.

We conducted a high-level risk assessment on Marlink's supply chain to identify suppliers who may be most susceptible to potential or actual risks related to human rights and decent working conditions. The assessment considered factors such as geography, business models structured around high-risk work practices, and sector and industry risks.

In our ongoing efforts to enhance operational efficiency and maintain robust oversight of our supply chain, we are implementing a new Enterprise Resource Planning (ERP) system. This digitalization initiative aims to provide better control and visibility over active suppliers and items.

The new ERP system will streamline our processes by integrating various functions such as procurement, inventory management, and supplier relationship management into a single, cohesive platform. This integration will enable us to monitor supplier performance more effectively, ensure compliance with our Supplier Code of Conduct, and mitigate potential risks related to human rights and working conditions.

Additionally, the ERP system will facilitate real-time data access and reporting, allowing us to make informed decisions and respond promptly to any issues that may arise. By leveraging advanced digital technologies, we aim to enhance transparency and accountability within our supply chain, ultimately contributing to our commitment to ethical business practices and human rights.

As part of our continuous improvement efforts, Marlink reassessed the supplier evaluation tool tested in 2023, due to a lower-than-expected response rate from the suppliers involved in the pilot. Based on this experience, we are evaluating several alternative systems and consolidated the process into a joint project aimed at identifying and procuring a more suitable solution. This initiative is part of our broader commitment to strengthening supplier due diligence and aligns with our 2024 target of implementing a new Enterprise Resource Planning (ERP) system to enhance transparency and control across procurement and supplier management.

We are working with relevant teams to ensure proper risk mitigation approaches are implemented with respect to these suppliers. Notably, we did not identify any human rights violations in Marlink AS's supply chain in 2024

## Our commitment

Extends beyond our own practices to those of our suppliers. We have a Supplier Code of Conduct (the "Supplier Code"), which is based on the United Nations (UN) 10 universally accepted principles in the areas of human rights, labour, the environment, and anti-corruption, derived from the UN Global Compact 1 2. The Supplier Code sets forth expectations designed to establish a baseline of norms and practices that protect labour and human rights, health and safety, environmental concerns, ethics and compliance, and the adoption of management systems.

Marlink communicates identified risks to our suppliers and internal executive. We regularly assess human rights risk in our business and supply chains. Our assessments identify higher-risk areas of our business based on external reports and standards, country risk profiles, previous assessments, and input from experts in this area. In addition, to assess supplier-specific risk, we consider the supplier performance against our Supplier Code, among other factors. We conduct due diligence on suppliers identified as having higher risk based on the assessments described above (collectively, "higher-risk suppliers"). The due diligence process also includes supplier background checks, examination of labour-related red flags that appear in publicly available databases and media sources, and a review of higher-risk suppliers' names against sanctions lists. If we discover red flags, we conduct

extensive and documented follow-ups to address these issues. In certain cases, we may decide to no longer pursue a relationship or to terminate our current relationship with a supplier.

We offer multiple reporting options to our employees and members of our extended workforce, including human rights. We promote this reporting channel through our internal policies, communications, and training. Our Supplier Code also requires suppliers to maintain reporting channels for their workers to raise concerns, including human rights concerns.

## Conclusion

Our wide array of products and services means we touch human rights in a variety of ways. The programs, processes, and efforts mentioned above serve as a foundation for further in-depth human rights due diligence, in line with our commitments to human rights. We remain committed to continual improvement and strengthening our human rights risk assessments and approach.

This statement was approved by the Marlink AS Board of Directors in June 2025.