

# **Due diligence report regarding the Transparency Act**

**BARTEC AS**

Approved by the Board of Directors of BARTEC AS

28.06.2024

## Preamble

The Transparency Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the public access to information on how enterprises address adverse impacts on fundamental human rights and decent working conditions.

The Act applies to larger enterprises that are resident in Norway and that offer goods and services in or outside Norway, i.e. enterprises such as BARTEC AS.

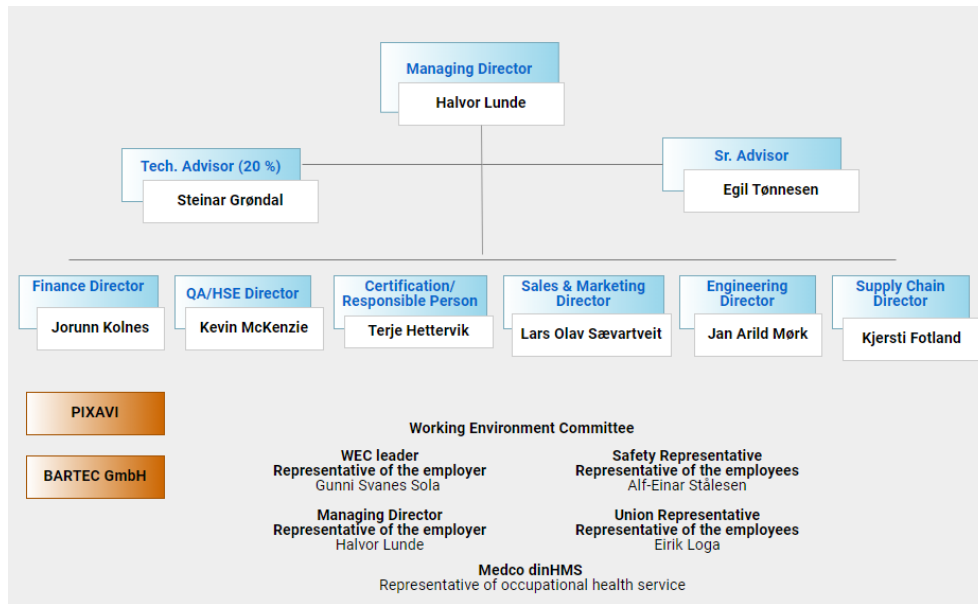
## BARTEC AS

BARTEC AS was established in Stavanger, Norway in 1983 and is a recognized manufacturer and distributor of equipment and systems for use in hazardous areas, mainly in the global offshore oil and gas industry.

BARTEC AS focuses on developing innovative and technologically advanced solutions by combining expertise in electronics engineering with extensive experience at the forefront of hazardous (EX) areas protection concepts. Our products are typically certified by relevant Notified Bodies according to IEC Ex and ATEX regulations.

Global distribution is handled via our BARTEC sister companies while all sales to Norwegian based customers are direct sales.

BARTEC AS is a subsidiary of BARTEC GmbH located in Bad Mergentheim, Germany. The organizational structure of the enterprise is as follows:



## Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

Within the BARTEC Group of enterprises, several guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions have been established:

### 1. Code of Conduct

Acting responsibly, in a responsible, ethically correct, and lawful manner is just as important to our success as our innovative force, technical performance, quality standards, and customer orientation.

Our Code of Conduct defines the ethical and legal framework within which we act. It sets out the fundamental principles of our conduct and in our relations with business partners and the public. It outlines the principles of our corporate actions and defines our corporate values.

Acting responsibly means acting lawfully just as much as it means acting ethically. These principles of conduct constitute the binding standards for the actions of all staff.

## 2. Whistleblowing

The good reputation we have earned among our customers, shareholders, and business partners, as well as among our employees and the public, can be seriously damaged by even the smallest infringement. It is therefore essential that reliable reporting channels are available, and which help ensure effective compliance by facilitating the reporting of potential misconduct and enabling possible violations to be thoroughly investigated and clarified.

We provide various reporting channels through which both employees and external stakeholders can report potential violations. BARTEC employees can make confidential reports directly to their supervisors or to senior management, as well as to the BARTEC Compliance Office. They can also contact Safecall if they wish to remain anonymous.

## 3. Procurement policies

Approximately 80% of our suppliers are Norwegian, 15% are located in Europe, and only a small number are from countries considered high-risk in terms of human rights violations and poor working conditions.

Adherence to compliance policies and a high level of trust and transparency throughout the procurement process are important to us.

The Supply Chain department has the responsibility for our approved suppliers listing. Approval is based on one or several of the following criteria:

- present deliveries
- external party references
- supplier quality system
- audits

We classify our suppliers as A-, B-, C-, D- and E-suppliers according to their critical impact on certified products, and suppliers classified as A are ranked as “Critical” and B as “Important”.

“Critical” and “Important” suppliers are evaluated by our Supply Chain department at least once a year. The audit plan for 2024 has 8 critical suppliers on the list, including our China based supplier of casted steel products.

## Assessment

Based on the requirements of the Transparency Act section 4, we have conducted a due diligence assessment relating to our suppliers. Our supplier selection criteria were based on transaction volumes exceeding NOK 100.000 over the last two years.

We have a total of more than 500 approved suppliers and of which 85 suppliers have been requested to complete a self-declaration in the areas of human rights, employment, environment, climate and anti-corruption. As of 28.06.2024, 32 of these suppliers have responded to the inquiry and none of them report violations of human rights and/or the right to decent working conditions.

Nonetheless, we have identified some critical Norwegian suppliers to ensure they comply with our requirements.

We have a few suppliers in high-risk countries, and these are closely monitored by us and third parties, for instance, through audits and interviews. These are typically suppliers in China. Additionally, these suppliers are ISO certified and thus regularly subject to audits by internationally acclaimed certification bodies like DnV and Bureau Veritas. Furthermore, we plan to visit our Chinese suppliers within the current year.

## Statement

Overall, BARTEC AS considers that the risk of human rights violations and poor working conditions, in our operations and in those of our suppliers and partners in Norway and other European countries, is low. We consider the risk to be higher in non-European countries, and further measures will be taken to address human rights and decent working conditions towards these suppliers in the years ahead and in compliance with the Transparency Act.

The due diligence assessment will be updated continuously with new information and any new suppliers and business partners.

Sandnes, 28.06.2024

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The most recent report can be found here: <https://bartec.com/company/quality-management>











# Due\_diligence\_report\_regarding\_the\_Transparency\_Act

Final Audit Report

2024-07-01

Created:	2024-07-01
By:	Torill Grude (torill.grude@bartec.no)
Status:	Signed
Transaction ID:	CBJCHBCAABAAJ_WbKkseuSesV0GUbVwbYzuxIKNTI_qI

## "Due\_diligence\_report\_regarding\_the\_Transparency\_Act" History

-  Document created by Torill Grude (torill.grude@bartec.no)  
2024-07-01 - 8:38:16 AM GMT
-  Document emailed to Jorunn Kolnes (jorunn.kolnes@bartec.no) for signature  
2024-07-01 - 8:38:26 AM GMT
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2024-07-01 - 8:38:26 AM GMT
-  Document emailed to Halvor Lunde (halvor.lunde@bartec.no) for signature  
2024-07-01 - 8:38:27 AM GMT
-  Email viewed by Lars Olav Sævartveit (larsolav.saevartveit@bartec.no)  
2024-07-01 - 8:43:10 AM GMT
-  Document e-signed by Lars Olav Sævartveit (larsolav.saevartveit@bartec.no)  
Signature Date: 2024-07-01 - 8:43:51 AM GMT - Time Source: server
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2024-07-01 - 10:49:03 AM GMT
-  Document e-signed by Jorunn Kolnes (jorunn.kolnes@bartec.no)  
Signature Date: 2024-07-01 - 10:50:32 AM GMT - Time Source: server
-  Email viewed by Halvor Lunde (halvor.lunde@bartec.no)  
2024-07-01 - 11:17:07 AM GMT
-  Document e-signed by Halvor Lunde (halvor.lunde@bartec.no)  
Signature Date: 2024-07-01 - 11:18:04 AM GMT - Time Source: server

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2024-07-01 - 11:18:04 AM GMT



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