



## 1.0 KEY INFORMATION ABOUT THE COMPANY

Allseas Norway AS is part of Allseas Group SA who is a major contractor in the global offshore energy industry, leading the way in subsea pipeline construction and transport, installation and removal of offshore facilities.

Pioneers in heart and soul, Allseas integrates cutting-edge innovation with engineering excellence to meet the market's ever-changing needs, committed to facilitate the energy transition through sustainable, technology-driven solutions.

Designed and optimised in-house, Allseas' versatile fleet of specialised vessels operate worldwide, equipped with the most advanced systems.

Allseas Group SA has its head office in Châtel-Saint-Denis, Switzerland, and offers its engineering services across the globe. Its subsidiary Allseas Norway AS has its head office in Sandnes Municipality and is a contract company with zero employees.

More details on Allseas Group's business and operations at:

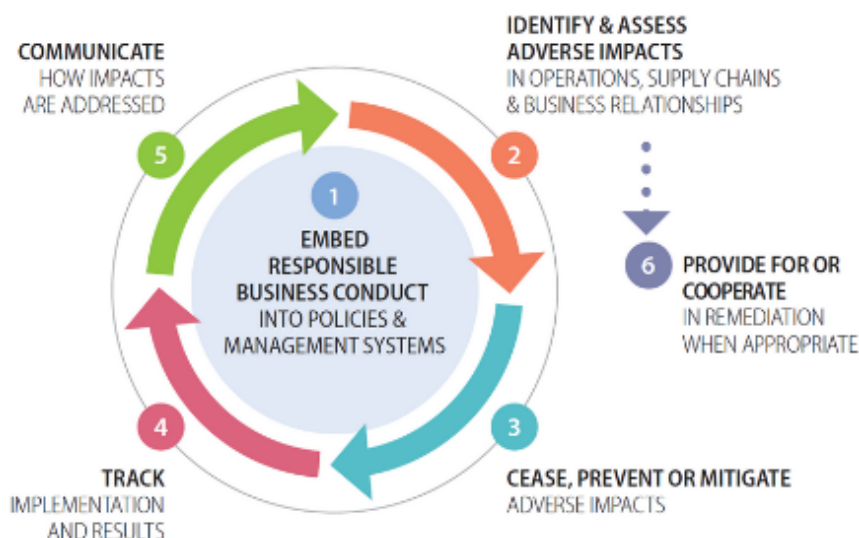
[Who we are | Allseas](#)

[What we do | Allseas](#)

## 2.0 DUE DILIGENCE AT ALLSEAS NORWAY AS

Allseas Norway AS builds its Due Diligence process upon the United Nations guiding principles for business and human rights and the Organisation for Economic Co-operation and Development (OECD) model for due diligence assessments for responsible business.

The model has six steps that describe how businesses can work towards more responsible and sustainable business practices. The main elements of the model are described below:



The company's due diligence will focus on areas identified as material by Allseas Group SA and its stakeholders, and those most relevant to the nature, context, products, services, and business relationships of the enterprise.

Allseas Norway AS is committed to upholding human rights throughout its supply chains. These commitments are firmly embedded in Allseas' Code of Conduct (CoC) and Rules of Conduct (RoC) and are reflected in the contractual obligations we establish with all business partners.

The following corporate policies form the foundation of our human rights due diligence and responsible business conduct:

- Allseas Code of Conduct
- Rule of Conduct – Modern Slavery
- Rule of Conduct – Violence and Harassment
- Rule of Conduct – Social Responsibility
- Rule of Conduct – Business Partners
- Corporate HSES Policy.

### **3.0 DUE DILIGENCE DEVELOPMENTS IN 2024**

In 2024, the company focused on understanding relevant regulations and conducting an inventory of existing methodologies and tools used in due diligence processes. This effort also included identifying areas for improvement and determining what needs to be developed to establish a robust, risk-based model for due diligence assessments. The primary objective is to ensure that this model effectively identifies actual or potential adverse human rights impacts, evaluates them based on their severity and likelihood, and implements prevention and mitigation measures that are appropriate and proportionate to the specific context of each impact.

The Allseas Group SA due diligence model will incorporate the following key elements (some of which are already established, others are currently under development):

#### **3.1 Corporate Risk Register**

Combines all identified risk aspects with significant actual or potential adverse impacts on Human Rights across Allseas operations, supply chains and business partners (tier 1 suppliers).

#### **3.2 Company policies on Human Rights and Social Responsibility**

Allseas' human rights due diligence is grounded in a strong foundation of company policies, including our Code of Conduct and internal rules of conduct. These documents articulate our core values, ethical standards, and expectations for responsible behaviour across all levels of the organisation. They emphasise respect for human rights, non-discrimination, and responsible business practices in line with international standards.

#### **3.3 Tracking and monitoring**

This includes regular desktop reviews and progress monitoring, as well as on-site inspections, depending on the topic and associated risk level. These assessments are carried out by Allseas personnel or independent third-party auditors. Our QHSE teams, project staff, and ethics and integrity experts receive ongoing knowledge updates, which inform the continuous improvement and refinement of internal processes and policies. This feedback loop ensures that Allseas remains adaptive, proactive, and firmly committed to responsible supply chain management.

#### **3.4 Internal whistleblowing system**

A mechanism that allows for anonymous reporting of potential misconducts or violations of our internal code of conduct. Any suspected violation of our Code of Conduct, including but not limited to Human Rights issues, can and should be reported through the whistleblowing system. These are subject to a thorough investigation from our Business Integrity Officer which will then advise on the remedial measures to be taken.

### **4.0 COMMUNICATION ON ALLSEAS' DUE DILIGENCE**

Allseas Norway AS is committed to transparency in reporting on its due diligence efforts, while ensuring the necessary balance with business confidentiality and commercial competitiveness.

No special circumstances have been identified in Allseas Norway SA, requiring deviation from Allseas Group SA policies and procedures.

**Transparency Act 2025**

Allseas Norway AS

Allseas Norway SA complies with all applicable national and international regulations relating to responsible business conduct and human rights due diligence. Where required, we will report on our due diligence processes and outcomes to relevant regulatory authorities.

In the coming period, our focus will be on further developing and strengthening the key components of our due diligence approach, as outlined above — ensuring that our systems remain effective, risk-based, and aligned with evolving regulatory expectations and best practices.

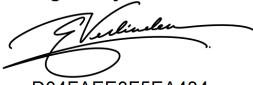
On behalf of Allseas Norway AS,

Sandness, 25 August 2025

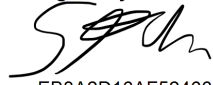
E.L.H. Verlinden  
Chairman of the Board

S. Olsen  
Board Member

Signature:

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