

2022 Transparency Act report

This report has been prepared in accordance with the Norwegian Transparency Act (the “Transparency Act”), section 5. The report summarizes the policies and procedures in Edda Wind ASA (“Edda Wind” or the “Group”) with respect to the safeguarding of human rights and decent working conditions and provides results on the performed due diligence for the Group.

Contents

- 1. About Edda Wind 2
- 2. Due diligence Process 2
 - 2.1. Our policies and commitments 3
 - 2.2. Identified risks in our operations 3
 - 2.2.1. Construction of vessels – shipyard labor 4
 - 2.2.2. Crewing services – hired-in personnel from risk countries 4
- 3. Our plans for 2023 4



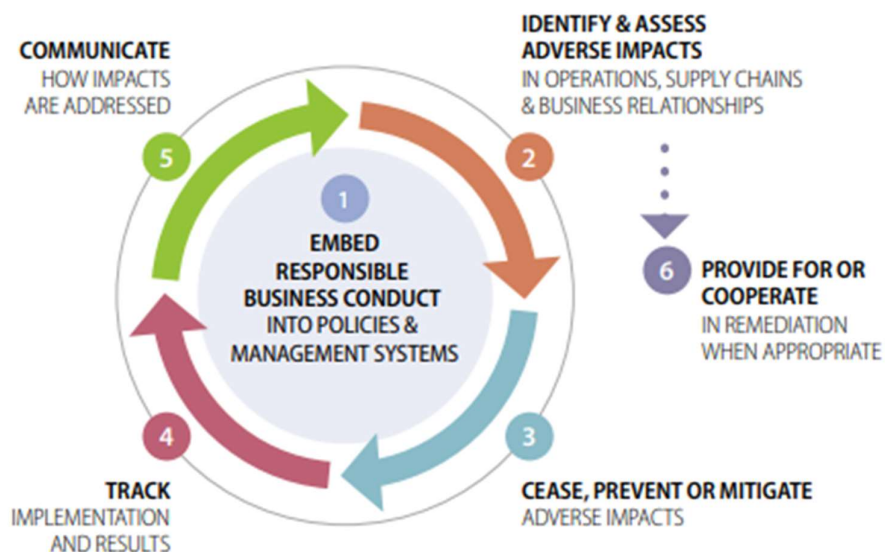
1. About Edda Wind

Edda Wind is a pure-play provider of purpose-built service operation vessels (SOVs) and commissioning service operation vessels (CSOVs) for offshore wind farms worldwide. The headquarter is located in Haugesund, Norway. During 2022, the Group operated three vessels on offshore wind farms in Europe; Race Bank Offshore Wind Farm and Hornsea 1 Offshore Wind Farm off the coast of UK and German Bight off the coast of Germany. Total operating income was EUR 28,425 thousand in 2022. As at 31 December 2022, Edda Wind also had a newbuilding programme of 8 vessels with shipyards in Spain, scheduled to be delivered in 2023-2024. Total assets were EUR 351,138 thousand at year-end 2022.

Edda Wind develops, builds, owns, operates, and charters out SOVs and CSOVs for offshore wind farms. Edda Wind has 10 permanent employees. Østensjø Rederi operates as ship manager and corporate manager for Edda Wind, which include services such as crewing, technical management, purchasing, accounting and project management. The hired-in services equaled approximately 145 full-time equivalents in 2022, including hired-in offshore personnel operating on board Edda Wind vessels.

2. Due diligence Process

The due diligence process in Edda Wind is based on the OECD Due Diligence Guidance for Responsible Business Conduct.





2.1. Our policies and commitments

The Group has established a Corporate Social Responsibility (“CSR”) policy, which specifies Edda Wind’s position related to human and labor rights, equal opportunities, anti-corruption and bribery. The Group’s CSR policy is adopted by the Board of Directors and shall be evaluated at least every second year. The CEO is responsible for ensuring follow-up of, and compliance with, the content of the CSR policy.

Edda Wind is committed to conducting business with respect to human rights and labor standards. Edda Wind work to ensure that our business operation, both in our own operation and our relations with business partners, do not cause or contribute to, or is directly linked to, actual or potential adverse impact on human rights and decent working conditions.

Our employees shall be treated with respect and given orderly working conditions. Forced labor, child labor and all forms of discrimination are strictly forbidden. It is the Group’s position that equal treatment of all employees is applied, and that discrimination based on a person’s gender, race, color, national origin, age, religion, sexual orientation or any other characteristics protected by applicable law is unacceptable. The Group has a zero-tolerance policy regarding corruption and bribery.

Edda Wind purchases goods and services from a range of suppliers, where a large part of the procurement is performed through our ship manager. Edda Wind purchases ship management and corporate management services from Østensjø Rederi. This includes crew services. All purchases related to operational vessels are performed by our ship manager, Østensjø Rederi, on Edda Wind’s behalf. These procurements are subject to the established policies and procedures in Østensjø Rederi.

Østensjø Rederi is a well-established shipping company with a safety management system that is ISM certified by several flag states. Østensjø Rederi is certified by DNV and holds certifications on ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 and ISPS. Østensjø Rederi is a member of Incentra and is compliant with the Maritime Labor Convention. Østensjø Rederi has an established supplier qualification procedure which includes a questionnaire that all new and existing suppliers need to fill out. The questionnaire is a self-assessment form that covers, amongst others, human rights and labor conditions. The purpose of this process is to ensure responsible business conduct within the supply chain. Each supplier will be scored based on their input to the questionnaire. Only suppliers with a score over a set threshold will be considered qualified for future purchases.

Procurement performed directly by Edda Wind is not subject to the Supplier Qualification Procedure mentioned above. Currently the purchases performed directly by Edda Wind relate to corporate services and the likelihood of adverse impacts is considered low. Edda Wind will assess the need for a separate self-assessment procedure for such procurement going forward.

2.2. Identified risks in our operations

Edda Wind has performed a mapping of suppliers and business partners in the supply chain to identify and assess any risk of actual or potential adverse impacts associated with our operations.

The identified risks have been prioritized based on the severity and likelihood of the adverse impact. Risk assessment is based on elements such as country origins, contract sizes and contract durations. Edda Wind has recognized two prioritized risks for 2022:

1. Construction of vessels – shipyard labor
2. Crewing services – hired-in personnel from risk countries



2.2.1. Construction of vessels – shipyard labor

During 2022, Edda Wind had ten shipbuilding contracts with two shipyards in Spain. The size of the contracts and the complexity of the work performed makes these contracts a prioritized risk area when it comes to responsible business conduct.

Potential negative impacts associated with the shipbuilding contracts include breaches of human right principles, such as child labor, modern slavery and working hours, as well as risk of corruption, discrimination and health and safety. The shipyards are the Group's two largest suppliers.

Supervision of the construction process is performed by Østensjø Rederi under the ship management agreement. Østensjø Rederi has, on Edda Winds behalf, performed a physical visit and audited both shipyards during 2021. The audit was performed based on the Eksfin checklist for qualification of shipyards. No adverse impacts were identified.

2.2.2. Crewing services – hired-in personnel from risk countries

Edda Wind purchases personnel from the Philippines. Certain challenges with regard to adverse impact linked to business activities exist in the Philippines, such as labor and employment, environmental issues and corruption.

The supplier of personnel services in the Philippines is compliant with the Maritime Labor Convention. In 2019, Østensjø Rederi performed an audit of the supplier without identifying any adverse impacts. A new audit is scheduled for 2023.

3. Our plans for 2023

During 2023 we plan on updating our policies and procedures related to human rights management and to anchor the roles and responsibilities of these procedures. We will assess the need to strengthen our supplier risk assessment process and due diligence process related to labor rights and working conditions.

Jan Eyvin Wang
Chairman of the Board
(Signed electronically)

Kenneth Walland
CEO
(Signed electronically)