

# 2023 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.

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# 1. About Edda Wind

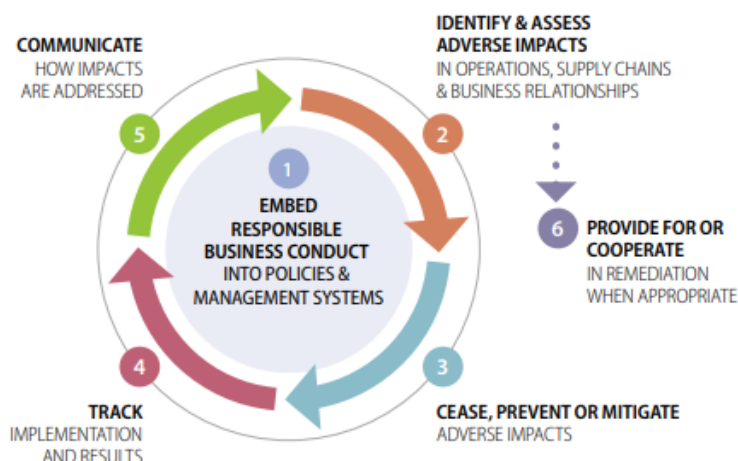
Edda Wind is a provider of purpose-built service operation vessels (SOVs) and commissioning service operation vessels (CSOVs) for offshore wind farms worldwide. The headquarter is located in Haugesund, Norway. During 2023, the Group operated three SOVs, three CSOVs and two chartered in frontrunners. The vessels operated in offshore wind farms in Europe; Race Bank Offshore Wind Farm and Hornsea 1 Offshore Wind Farm off the coast of UK, German Bight off the coast of Germany, Seagreen Windfarm off the coast of Scotland and Saint Briec off the coast of France. Total operating income was EUR 39,368 thousand in 2023. As at 31 December 2023, Edda Wind also had a newbuilding programme of 8 vessels with shipyards in Spain, Romania and Vietnam, scheduled to be delivered in 2024-2026. Total assets were EUR 582,258 thousand at year-end 2023.

Edda Wind develops, builds, owns, operates, and charters out SOVs and CSOVs for offshore wind farms. 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 equalled approximately 259 full-time equivalents in 2023, including hired-in offshore personnel operating on board Edda Wind vessels.

During 2023, Edda Wind made a strategic decision to establish an independent entity by 2025, enabling Edda Wind to perform services that have previously been outsourced. At year end, Edda Wind employed 20 permanent employees, located in Haugesund and UK.

# 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's Corporate Social Responsibility ("CSR") policy specifies Edda Wind's position related to human and labour 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 labour 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.

The people working for us shall be treated with respect and given orderly working conditions. Forced labour, child labour 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, colour, 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 labour 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 2023:

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



### 2.2.1. Construction of vessels – shipyard labour

During 2023, Edda Wind had contracts for construction of vessels in Spain (6 newbuilds), Vietnam (2 newbuilds) and Romania (2 newbuilds) The size of the contracts and the complexity of the work performed makes these contracts a prioritised risk area when it comes to responsible business conduct.

The shipyard industry inherently faces challenges when it comes to protecting human rights and labour rights, mainly due to their dependencies on a large workforce. Further, the work at shipyards is physically demanding and often hazardous. Identified potential negative impacts associated with the shipbuilding contracts include breaches of human right principles, such as child labour, modern slavery and working hours, as well as risk of corruption, discrimination, indecent working conditions and health and safety. The shipyards are the Groups largest suppliers.

Supervision of the construction process is performed by Østensjø Rederi under the ship management agreement. Each shipyard undergoes Østensjø's Shipyard Qualification Procedure. Each yard must fill out a self-assessment checklist based on the Eksfin shipyard checklist. The results of the checklist information are followed up by physical audits on the shipyard premises. Further, the construction of new vessels is supervised by Edda Winds site team at each yard.

### 2.2.2. Crewing services – hired-in personnel

Regulating vessel crewing services is crucial to ensuring the safety, well-being, and rights of seafarers. The provision of crewing services is a highly regulated industry and these regulations encompass strict standards for recruitment, training, and working conditions, adhering to international guidelines such as the International Maritime Organization (IMO) and the International Labour Organization (ILO) Maritime Labour Convention (MLC). Compliance with these standards helps prevent exploitation, ensures fair wages, and mandates adequate rest periods and safe working environments.

Edda Wind did not employ any seafarers directly in 2023 and all crew services is hired in external crewing companies. The crew working on Edda Wind vessels are diversified and from several different countries, mainly Norway, UK, Poland, France and the Philippines. When hiring in crewing services there is an inherent risk of human right infringement, especially in high-risk countries such as the Philippines. These risks include variability in quality and competence of the crew, non-compliance with relevant maritime regulations and unethical labour practices, such as exploitation and underpayment.

Edda Wind has implemented several measures to mitigate these risks. Firstly, crew services are only hired in from limited, selected and well reputable external crewing companies which must be MLC approved. Edda Wind maintains ongoing dialogue with the crewing companies to ensure that all crew members are paid according to internationally agreed CBA's and wage tariffs and minimum wage regulations. To ensure safe working conditions all crew members need to comply with relevant competency matrixes and follow the familiarisation procedures for the Edda Wind vessels. Further, all crew members are provided with necessary protective equipment.

To ensure the safe operation of each vessel and to provide a link between the company and those on board, the company has designated a person ashore (DPA) having direct access to the highest level of management. The responsibility and authority of the DPA includes monitoring the safety and pollution prevention aspects of the operation of each vessel and ensuring that adequate resources and shore-based support are applied, as required. During 2024, Edda Wind will also implement a formal anonymous whistleblowing channel available to all crew members.

## 2.3. Results and reporting

We have not observed evidence or received any reports indicating any breaches of Human Rights or decent working conditions in our own operations or in our supply chain during 2023.



### 3. Our plans for 2024

A crucial part of becoming an independent organisation and managing our own vessels is to implement our own internal management system and obtain a document of compliance and ISO certifications. The process started in 2023 with the recruitment of our own HSEQ specialists. During 2024, we will define our way of working to foster the Edda Wind safety culture.

We've already started the process of strengthening our policies and clarifying our commitments. The new policies have been implemented in 2024. The new policies include an Anti-Corruption Policy, Human Rights Policy, Environmental Policy, Data Protection Policy, HS&Q Policy, Trade and Sanctions Policy and Whistleblowing Policy. These policies replaced the Corporate Social Responsibility Policy. Further, we will start implementation of a formal whistleblower channel in 2024.

In 2024, we also plan to release the Edda Wind Code of Conduct, setting our expectations, commitments and requirements for ethical conduct from our employees and Board members, and also extending to all persons working on board the Edda Wind vessels. The Code of Conduct will be followed by a separate Supplier Code of Conduct. Edda Wind is currently preparing to take over ownership of supply chain management and aim to implement the Supplier Code of Conduct with a procedure for upfront assessment of risk and periodical supplier audits setting expectations for ethical conduct by our suppliers.

#### **The Board of Directors** (Signed electronically)

25.06.2024

Geir Flæsen  
Chairman of the Board

Adrian Geelmuyden  
Board member

Duncan Bullock  
Board member

Toril Eidesvik  
Board member

Martha Kold Monclair  
Board member

Kenneth Walland  
CEO