

## Optimar Policy for the Norwegian Transparency Act

Optimar has high standards for business practice and Corporate Social Responsibility and expects similar from our suppliers and business partners.

Our suppliers consist of individual suppliers and their subcontractors, and Optimar requires that our suppliers' operations are carried out in compliance with fundamental human rights and decent working conditions.

Our Management System to ensure labor conditions and human right standards with our suppliers and business partners comprises:

- Optimar Ethical guideline and Whistleblower Policy applicable for all who act on behalf of the company;
  - o Code of Conduct
  - o Human Rights
  - o Improper payments, corruption, bribery, gifts, conflict of interest and fair competition
  - o Business relations, both due diligence and follow-up
  - o Compliance
  - o Whistleblower Policy
- Training for all Optimar employees in our Ethical Guideline and Whistleblower Policy to ensure awareness.
- Requirements for Business Ethics, Compliance and HSEQ standards in our Purchase Frame Agreements and in our general Terms and Conditions that follow every Purchase Order.
- In progress: System for structured supplier risk review and rating according to the Norwegian Transparency Act
- In progress: Optimar Policy for supplier follow up and revision plan according to the OECD Guidelines for Multinational Enterprises
- In progress: Policy for response if we identify potential risks or actual events where fundamental human rights and decent working conditions are compromised with one of our suppliers.

The parts of our management system in progress will be documented in our Sustainability report published June 30<sup>th</sup>, 2024.

We have a contact form available at our website which those who seek information regarding how Optimar addresses actual and potential adverse impacts may use and to which they will receive a written response within three weeks.

**Optimar, 01.12.2024**

*Cecilie Alnes Dyb*  
Cecilie Alnes Dyb (Nov 29, 2024 11:37 GMT+1)

**Cecilie Alnes Dyb  
Compliance Officer**






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Final Audit Report

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