



## STATEMENT ACCORDING TO

### THE NORWEGIAN TRANSPARENCY ACT OF 1 JULY 2022

#### 1. INFORMATION ABOUT THE COMPANY

##### 1.1 Basic information

Hevold Group AS (the "**Company**") is a company fully owned by the family company Høyskel Holding AS<sup>1</sup>.

Hevold Group AS provides head office services to the subsidiaries Hevold Shipping AS, Searunner Shipping AS and Norair AS (hereinafter "**Hevold Group**"). This report deals with Hevold Group. In total, Hevold Group has 41 employees. All employees work in Norway at Hevold Group's head office in Grønland, Oslo.

The three subsidiaries all have managing directors who report to the respective company's board consisting of one member in addition to the chairman, as well as the Chief Executive Officer (the "**CEO**") of Hevold Group AS. The CEO of Hevold Group AS reports to the Company's board, which consists of two members in addition to the chairman. The Company's highest body is the general meeting.

##### 1.2 The Company's services

Hevold Group provides forwarding services, and the group's overall vision is to be Norway's leading provider of multimodal transport solutions. Through the subsidiaries Hevold Shipping, Searunner Shipping and Norair, we deliver a wide range of freight services via land, sea and air on 5 continents. With experience from several decades in the industry, we have built up a high level of expertise and a large network of skilled companies that handle national and international transport.

##### 1.3 The Company's objectives and focus areas within sustainable working life and production

The Company and Hevold Group want to work actively to ensure that human rights and decent working conditions are central to our operations. Within shipping, transport and forwarding, the Hevold Group considers particularly HSE work, safe workplaces, orderly pay conditions and working hours, both for our own employees and at our partners, to be areas where Hevold Group wishes to have a particular focus.

#### 2. THE COMPANY'S GUIDELINES AND ROUTINES FOR WORKING WITH THE TRANSPARENCY ACT

##### 2.1 The work with the Transparency Act is anchored in the Company's board

The board has decided that the Company must work actively with the Transparency Act and comply with the obligations arising from the Transparency Act.

As part of the work, the Company has appointed a role as operationally responsible for the Transparency Act (the "**Transparency Act Officer**"). The Transparency Act Officer has the operational

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<sup>1</sup> The Transparency Act applies to "larger businesses" that "offer goods and services", cf. the Transparency Act section 2. The Consumer Authority which is the supervisory authority has also stated on its [website](#) that a parent company in a group must itself offer goods and services to be covered by the law, and that the parent company's activity itself must be assessed in this regard. Our assessment is that Høyskel Holding AS is not covered by the conditions set out in the Transparency Act section 3, on the basis that it is a pure holding company with no activity, and therefore does not need to carry out a due diligence assessment.

responsibility for responding to and if necessary, following up on received information requests. The Transparency Act Officer also has the operational responsibility for following up suppliers and business partners, and for carrying out risk assessments.

If the Transparency Act Officer discovers that there is a significant risk of negative impact, or that such negative impact has actually occurred, the Transparency Act Officer shall, together with the Company's management and/or board, assess which further measures are to be taken.

## **2.2 The Company's work with basic human rights and decent working conditions in the business and in the supply chain**

Hevold Group has anchored its commitment to respect basic human rights and decent working conditions as defined in the UN's guiding principles on business and human rights and in the OECD's guidelines for multinational enterprises in its [Supplier Code of Conduct](#). The obligation implies that Hevold Group manages its activities in a sound manner, including being a responsible company in the society. We also require our suppliers to accept our Supplier Code of Conduct as a minimum standard for what we expect from all suppliers to Hevold Group.

Hevold Group has established a system to be able to continuously map our supply chain. Among other things, we have divided our suppliers and business partners into the following overall categories;

- Risk group A: High risk
- Risk group B: Medium risk
- Risk group C: Low risk

The suppliers/business partners are assessed against certain risk drivers such as country risk, industry and product type, and are placed in the risk category we deem appropriate based on an overall assessment. In the risk assessment, we will focus on following up suppliers/business partners that we consider have a high risk, and where the degree of severity and the probability of negative consequences for human rights and/or decent working conditions are greatest. Furthermore, we will carry out regular assessments in line with the requirements of the Transparency Act, which means that the suppliers/business partners can be moved to another risk group if we discover and/or become aware of conditions that affect the risk assessment.

As part of the annual audit, we will review and, if necessary, update our guidelines in view of potential negative consequences for decent working conditions and basic human rights related to our operations. This includes internal guidelines, but also requirements for our suppliers and business partners.

## **2.3 Information Requests**

As part of ensuring transparency and good handling of information requests from "anyone", cf. the Transparency Act section 6, the Company has published information about the Transparency Act on its [website](#). We have also created a contact form on the Company's website as the first point of contact for inquiries related to the Transparency Act for those who wish to submit information requests and/or report suspected violations of basic human rights and decent working conditions. In the latter case, the inquiry will be anonymous.

The Company has chosen this measure to make it easy for the general public to know where to turn in case of questions or to report suspected violations. In addition, such contact form helps to structure and simplify an overview of received requests and their further processing. The Company

will actively use requests received in our further work with the Transparency Act and in the assessments that are carried out.

Since the law entered into force, the Company has not received any information requests (as of 15 June 2023).

#### **2.4 Due diligence assessment of the Company's suppliers**

Since the Transparency Act entered into force, Hevold Group has worked to establish routines and systems for structured identification of our suppliers in order to comply with the duties established by the Transparency Act.

We are well underway in getting an overview of our supply chains. Based on the principle of proportionality, and in order to prioritize the work where we believe Hevold Group can have the greatest impact, our main focus has been on the largest suppliers of each individual company in the group.

As part of the due diligence assessments, Hevold Group has asked specific individual suppliers to answer various questions relating to company size, place of business, health and safety, employment rights and more in a separate list of questions ("**Declaration Form**"). We continue the identification of our suppliers as part of the Company's ongoing due diligence assessments.

Until now, the due diligence assessments of Hevold Group's suppliers have not included subcontractors. Nevertheless, we have asked questions about whether and possibly which subcontractors the suppliers use in the delivery to Hevold Group. We have also asked whether the suppliers themselves are subject to the Transparency Act, in which case means that they themselves are obliged to carry out the necessary assessments of their suppliers. The Transparency Act Officer in Hevold Group will, in consultation with the management, continuously assess the need to carry out further investigations of subcontractors.

### **3. CUSTOMER IDENTIFICATION**

The Transparency Act does not require a specific identification of Hevold Group's customers. However, Hevold Group generally has good knowledge of our customers, and we are not aware of any general or specific risk of human rights violations among the customers.

#### **3.1 Specifically about the Hapag-Lloyd Agency**

Hevold Shipping AS is an agent for Hapag-Lloyd in Norway. It is our assessment that Hapag-Lloyd does not fall within the definition of either a supplier or a business partner as they do not provide goods or services to Hevold Shipping/Hevold Group. The fact that Hevold Shipping is an agent suggests that Hapag-Lloyd is closer to being a customer or service recipient rather than a supplier/business partner in the supply chain, as defined in Section 3, Paragraph 1, Subsections d. and e. of the Transparency Act.

We are aware that Hapag-Lloyd has taken a clear stance on issues such as modern slavery and human trafficking, both within their own operations and in their supply chain and actively engage in identification, self-assessments, and monitoring of their suppliers.

#### 4. RISK ASSESSMENTS RELATED TO HUMAN RIGHTS AND FUNDAMENTAL WORKING CONDITIONS

As of now, 7 out of 7 have answered the questions in Hevold Group's Declaration Form for suppliers.

When Hevold Group receives responses from a supplier, the Transparency Act Officer ensures an evaluation of the answers. If there is reason to suspect negative impact or significant risk of negative impact, the Transparency Act Officer shall involve the board or management (depending on the circumstances of the specific case) in assessing the further actions Hevold Group should take. Such action could, for example, involve engaging in a dialogue with the supplier to help mitigate the risk.

No information in the supplier Declaration Forms received up until June 2023 indicates any violations or significant risk of violations of human rights or fundamental working conditions, and therefore, no mitigating measures have been deemed necessary. Declaration Forms completed by companies operating in potentially vulnerable industries such as transportation and freight forwarding have not indicated significant risk of lack of decent working conditions or violations of human rights.

#### 5. ACTIONS BASED ON RISK ASSESSMENT

Hevold Group has not identified any actual negative consequences or significant risk of negative consequences to its operations through the risk assessments conducted.

Based on the information received by the Company, the Company's board has assessed the risk of violations of fundamental human rights and decent working conditions within its own operations, business partners, and suppliers to be low. There have also been no circumstances in the information received from suppliers or other sources that warrant further actions or investigations. Therefore, the board has not deemed it necessary to implement any mitigating measures at this time.

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Oslo, 28 June 2023



Finn Olav Elde  
Chairman of the Board



Henriette Marie Høyskel  
Board member



Hans-Fredrik Høyskel  
Board member