



2025 TRANSPARENCY ACT REPORT

AN INNOVATIVE
TECHNOLOGY LEADER IN WASTE
MANAGEMENT

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1 General Information

1.1 Purpose of the Report

The Transparency Act shall promote businesses' respect for human rights and decent working conditions, as well as ensure the public's access to information. Among other things, the Act imposes a duty of information on the businesses and a duty to carry out due diligence assessments which must be explained in this report. The Transparency Act aims to reduce the risk of human rights violations, avoid modern slavery and ensure decent working conditions.

This report is to give the public insight into the business' key findings in the due diligence assessments, and which measures have been implemented.

2 About our business

2.1 Organization and Operating Area

Established in 2011, Soiltech is an innovative technology company specializing in the treatment, recycling and sustainable handling of contaminated water and solid industrial waste streams at site. Our technologies enable cost savings and lower CO2 emissions through waste reduction, waste recovery and reuse. Soiltech operates world-wide, with its head office at Forus in Sandnes, Norway.

The Soiltech group consists of parent company Soiltech ASA and the subsidiaries Soiltech Offshore Services AS, Sorbwater Technology AS and Soiltech Romania SRL.

As a company mainly in the energy sector, we recognize the role we play in promoting sustainable development and mitigating the impacts on human rights. Our operations are integral to the functioning of modern society, and we are committed to ensuring that our activities are conducted in a responsible and sustainable manner.

Core Values

- **Quality**
- **Integrity**
- **Responsibility**

3 Governance and responsibility

The Board of Directors has the overall responsibility for ensuring that Soiltech conducts its operations in accordance with the Transparency Act and internationally recognized human rights standards.

Operational responsibility for implementing the due diligence process lies with executive management.

The VP HSSEQ & Sustainability coordinates the company's work related to human rights, supply chain due diligence and sustainability reporting.

The Board receives regular updates on due diligence assessments, risk management and mitigation measures.

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4 Communication with interested parties

Soiltech engages with a broad range of stakeholders across its value chain. The following table summarizes key stakeholder groups and the channels and frequency of communication:

Stakeholder	Communication Channels	Frequency
Customers	Meetings, e-mail, site visits, customer surveys	Ongoing, monthly/annually
Employees	All-hands meetings, HSE Topics, intranet, e-mail, 1:1 conversation / Check in	Daily/Weekly/monthly
Board of Directors	Board meetings, reports, e-mail	Quarterly
Suppliers	Contracts, audits, supplier evaluations, meetings, questionnaires	Quarterly/Upon contract/annually
Authorities	Reporting, dialogue meetings, inspections, industry organizations	As needed / annually
Public / Society / Neighbours	Website, reports, press releases, social media	Annually / ongoing
Investors / Stock exchange	Stock exchange announcements, quarterly reports, general meeting	Quarterly / annually
Partners	Meetings, collaboration agreements, project management	Ongoing / project-based

5 Embedding human rights in own business

Soiltech is committed to respecting internationally recognized human rights and ensuring decent working conditions throughout its operations and value chain. Our approach is aligned with the UN Guiding Principles on Business and Human Rights (UNGPR) and the OECD Due Diligence Guidelines.

Respect for human rights and labour standards is embedded in Soiltech's governance framework and corporate policies. These policies define expectations for employees, management, suppliers and business partners and provide the foundation for responsible business conduct across the organization.

5.1 Soiltech's Policy Framework

<p>Labour and Human Rights Policy</p> <p>This policy outlines Soiltech's commitment to respecting internationally recognized human rights and labour standards in both our own operations and throughout our value chain. The policy establishes expectations regarding working conditions, non-discrimination, freedom of association, and the prevention of forced labour and child labour.</p>
<p>Code of Conduct</p> <p>Soiltech's Code of Conduct defines expectations related to ethical behaviour, business integrity, anti-corruption and responsible conduct for employees, management and third parties. The Code integrates the former Anti-Bribery and Corruption Policy and Ethical Guidelines into a single framework for ethical business practices.</p>
<p>Health, Safety & Quality Policy</p> <p>This policy supports Soiltech's commitment to maintaining safe working conditions and continuously improving health, safety and quality performance. The policy is implemented through management systems aligned with ISO 45001 and ISO 9001.</p>

Climate & Environment Policy

Soiltech is committed to minimizing environmental impact and contributing to sustainable solutions. Climate and environmental considerations are integrated into operational decision-making and risk management.

Diversity, Equity & Inclusion Policy

This policy promotes an inclusive and respectful workplace where employees are treated fairly and without discrimination, regardless of gender, ethnicity, religion, age, disability or other personal characteristics.

Information Security Policy

This policy governs the protection of company and personal data and ensures secure management of information systems and digital infrastructure.

5.2 Operational Measures and Management Systems

- **ISO 45001 Certification** – Soiltech is certified by DNV according to ISO 45001, demonstrating commitment to improving employee safety and reducing workplace risks.
- **Safety Representatives and Working Environment Committee (AMU)** – Active committee facilitating collaboration between management and employees.
- **Occupational Health Services** – Employees have access to health monitoring, preventive health care and professional support.
- **Anonymous Reporting Channel** – Whistleblowing channel allowing employees and stakeholders to report concerns confidentially.
- **Incident Reporting System** – Structured system for reporting observations, incidents, non-conformities and improvement suggestions.
- **Annual HSEQ KPIs** – Key performance indicators monitoring workplace injuries, sickness absence, environmental performance and customer satisfaction.
- **Awareness and Training** – Human rights and responsible business conduct communicated through internal training and monthly HSE Topics.

6 Embedding human rights with suppliers

Soiltech works systematically to embed respect for human rights and decent working conditions throughout its supplier relationships. This is achieved through a combination of clear expectations, contractual requirements, and ongoing follow-up.

All suppliers are required to adhere to Soiltech’s Supplier Code of Conduct, which sets out minimum standards related to human rights, labour conditions, non-discrimination, working hours, wages, and ethical business practices. Acceptance of these requirements forms part of the supplier approval process.

Human rights considerations are further integrated into supplier management through:

- **Pre-qualification and onboarding processes**, where suppliers provide information on their policies, management systems, and compliance with human rights and labour standards
- **Ongoing supplier evaluations**, where human rights due diligence is included as a specific assessment criterion

- **Risk-based follow-up**, where suppliers identified with elevated risk are subject to closer dialogue, additional documentation requests, and, where relevant, audits

Soiltech also expects its suppliers to apply similar standards within their own supply chains and to demonstrate transparency where risks are identified. Through these measures, Soiltech seeks to ensure that respect for human rights is not only assessed, but actively integrated and followed up in supplier relationships over time.

7 Suppliers and human rights Risk Assessment

Soiltech classifies its suppliers into categories A, B, and C based on their importance to **operational performance**, including factors such as criticality, complexity, and impact on business operations. This classification is intended for operational management purposes and does not in itself reflect the risk of human rights violations.

For the purpose of due diligence in accordance with the Transparency Act, Soiltech applies a separate methodology to assess the **risk of adverse impacts on human rights and decent working conditions** within the supply chain, as described in the procedure OPS-PRO-00010 Supplier Evaluation & Approval.

All suppliers are subject to an initial risk assessment (“social risk”), where risk is evaluated based on:

- Geographical risk, derived from the ITUC index on labour rights
- Industry risk, based on the EBRD index linked to NACE codes

These factors are quantified and equally weighted to determine an overall social risk level (low, medium, or high).

Where the initial assessment results in a medium or high social risk, Soiltech performs a further evaluation to determine whether risk-reducing measures are required or whether the risk level can be accepted based on available information. This includes assessing whether the identified risks are adequately mitigated, allowing Soiltech to conclude on a final (“end risk”) level, which in some cases may be assessed as low.

These evaluations are documented and managed in Soiltech’s CRM system, which supports the systematic follow-up, documentation, and reassessment of suppliers as part of the company’s due diligence process.

This risk assessment forms the basis for further follow-up and prioritization of actions. Suppliers identified with a higher risk of human rights violations are subject to enhanced due diligence measures, which may include:

- extended supplier evaluation
- dialogue and collection of additional documentation
- audits or other targeted measures

In addition, human rights due diligence is included as a specific evaluation criterion in the supplier assessment process, as defined in OPS-PRO-00010 Supplier Evaluation & Approval. This includes assessing whether the supplier:

- complies with applicable human rights laws and standards
- has established policies and management systems
- avoids child labour and forced labour
- respects workers’ rights and working conditions

Through this approach, Soiltech ensures that supplier follow-up within the due diligence process is risk-based and focused on areas with the highest likelihood of human rights violations, regardless of the supplier’s operational category (A, B, or C).

7.1 Supplier Overview – Reporting Period

In the reporting period we had 146 suppliers registered and approved in our CRM Management system.

Results Human Rights Risk due diligence is shown in the table below:

Risk Category	Low	Medium	High
Geo Risk	130	12	4
Industry Risk	94	43	9
Social Risk	83	52	11

Operational Risk due diligence is shown in the table below:

Operational Risk Category	Number
Critical suppliers (A)	4 suppliers
Key suppliers (B)	13 suppliers
Other suppliers (C)	129 suppliers
Suppliers evaluated during reporting period	15 suppliers

8 Remediation and grievance mechanisms

External parties can alert concerns using the contact information published on our website. Internally, employees and consultants are encouraged to speak up about negative conditions in the workplace and seek advice if they are in doubt. They can report a concern to their line manager, a representative for the management team or safety delegates and AMU. If anyone sees the need to report anonymously, we have established a whistleblowing channel where all reports are managed confidentially.

Mechanism	UNGP Reference	Description
Internal whistleblowing channel	UNGP 29	Employees and stakeholders can report concerns related to human rights, safety or unethical behaviour
Supplier grievance communication	UNGP 22	Suppliers must report any identified human rights violations
Corrective action process	UNGP 22	Soiltech may require remediation measures or terminate supplier relationships

9 Due Diligence assessment

Soiltech conducts human rights due diligence in accordance with the OECD Due Diligence framework and the UN Guiding Principles on Business and Human Rights (UNGP). The company identifies and assesses potential and actual impacts on human rights in its own operations and supply chain. Risks are prioritized based on severity and likelihood.

Soiltech applies a structured risk-based approach to supplier assessment and human rights due diligence. While we have not identified any confirmed breaches of human rights or labour conditions in our supply chain, we acknowledge that risk is dynamic and requires continuous evaluation.

9.1 Risk in Own Operations

Risk	Description	UNGP Ref.	UDHR Articles	Initial Risk	Mitigation Actions	Residual Risk
Offshore Health & Safety	Offshore operations involve heavy equipment, chemicals and lifting operations which may	UNGP 13 & 17	Art. 3 – Right to life and security	Medium	ISO 45001 safety management, offshore safety training, toolbox talks, risk assessments, incident reporting, statutory targeted health examination	Low

	affect worker safety.					
Fatigue / Working Hours Offshore	Extended offshore rotations may affect worker wellbeing if not managed properly.	UNGP 13 & 18	Art. 24 – Right to rest and leisure	Low	Compliance with offshore labour regulations, rotation schedules, management procedures, HR monitoring	Low
Discrimination or Unequal Treatment	Risk related to recruitment, promotions, or workplace equality.	UNGP 11 & 13	Art. 1, 2, 7 – Equality and non-discrimination	Low	Equal opportunity policies, HR procedures, whistleblowing channel, diversity initiatives	Low
Data Protection and Privacy	Handling employee data and operational information could impact privacy rights.	UNGP 15 & 18	Art. 12 – Right to privacy	Low	GDPR compliance procedures, IT security measures, access control, internal audits	Low

9.2 Supply Chain Risks

Risk	Description	UNGP Ref.	UDHR Articles	Initial Risk	Mitigation Actions	Residual Risk
Forced Labour in Supply Chain	Risk of forced or involuntary labour in international supply chains.	UNGP 13, 17 & 19	Art. 4 – Prohibition of slavery	Medium	Supplier due diligence questionnaires, supplier audits, code of conduct	Low
Unsafe Working Conditions at Manufacturing Suppliers	Mechanical manufacturing and welding environments may expose workers to hazards.	UNGP 13 & 18	Art. 3, 23 – Safety and safe working conditions	Medium	Supplier HSE requirements, audits, technical inspections, certification requirements	Low
HSE Risks in Logistics and Transport	Drivers and transport personnel may face unsafe conditions.	UNGP 13	Art. 3 – Personal security	Medium	Qualified logistics providers, Supplier due diligence questionnaires, supplier performance monitoring	Low
Limited Supply Chain Transparency	Risk of hidden labour violations further down the supply chain.	UNGP 17 & 20	Art. 8, 23 – Right to remedy and fair conditions	Medium	Mapping of critical suppliers, supplier transparency requirements, supplier code of conduct, risk-based assessments	Medium-Low

Soiltech prioritizes risks based on severity and likelihood in accordance with the OECD Due Diligence framework. Risks related to health and safety and labour conditions in the supply chain are considered the most significant due to the nature of the industry and international supplier network.

10 Implemented measures year over year

2022 Measures	
1	Developed supplier Questionnaire and incorporated Supplier's Code of Conduct, including equal terms in competitive markets, security of products/services, compliance with labour market rules, human rights, anti-child labour, discrimination, conflict of interest, bribes and gifts, and international standards.
2023 Measures	
2	Continuous monitoring of actual and potential risks of negative impact on human rights and decent working conditions in our supply chain.
3	Working pro-actively on identifying meaningful KPIs related to supplier human rights risk identification.
4	Providing training and awareness to the organisation on human rights topics. Awareness communicated via HSE monthly topics and yearly professional exchange days held in Q1 2024.
5	Collaborate and work together with other small and medium businesses within our industry on the Transparency Act, to share and learn from each other.
6	Collaborate with software developers on tools to perform due diligence. Collaboration started with www.compera.no for the development of a software tool to report sustainability through our value chain (Scope 3).
2024 Measures	
7	Added social risk as a method to better evaluate the suppliers' risk related to human rights violations, using a combination of geography and industry risk factors to assess social risk.
8	Added Human Rights as an aspect in our Audit questions.
2025 Measures	
9	Strengthen our Policy Framework regarding Environment, Social and Governance.
10	Continuous monitoring of actual and potential risks of negative impact on human rights and decent working conditions in our supply chain.

11 Results and future plans

11.1 Results of Due Diligence Measures

During the reporting period, Soiltech continued to strengthen its due diligence processes and supplier engagement. Key outcomes include:

- Completion of supplier evaluations for critical and key suppliers
- Integration of social risk indicators into supplier risk assessments
- Strengthened supplier dialogue related to human rights and ethical standards
- Increased internal awareness through training and HSE communication channels

Soiltech has not identified any confirmed cases of human rights violations or unacceptable working conditions in its own operations during the reporting period. However, the company acknowledges that risks may occur within global supply chains and therefore continues to strengthen its due diligence processes.

11.2 Plan for Continuous Improvement

When considering potential breaches of the Transparency Act, it is observed that the risk of non-compliance is higher among suppliers operating internationally in regions where the transparency legislation does not apply. Consequently, our strategic focus is to continue to work closely with our suppliers abroad to mitigate these risks. This proactive approach involves enhancing compliance and oversight measures to ensure that our suppliers adhere to the ethical and legal standards expected by Soiltech.

We will continue to focus on the following key areas:

- Policy Framework development
- Due diligence processes
- Supplier Management
- Employee training and engagement
- Monitoring and reporting
- Community and stakeholder engagement
- Grievance mechanisms

Soiltech recognizes that responsible business conduct requires continuous effort. The company will continue strengthening its due diligence processes and collaboration with suppliers to ensure respect for human rights and decent working conditions across its operations and value chain.

Sandnes, 14th April 2026

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2025 TRANSPARENCY ACT REPORT

Final Audit Report

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