

# Transparency Act Report

HG Solutions Sp. z o.o. NUF – 2024

Account of due diligence assessments,

HG Solutions Sp. z o.o. NUF,

Norwegian Register of Business Enterprises NO 912 747 654 MVA.



## Table of contents

1.	The 2024 Transparency Act Report.....	3
1.1	Introduction .....	3
1.2	Contact Information .....	3
1.3	Obligation to report .....	3
2.	The company's activities .....	4
2.1	Organisation and area of operations .....	4
2.2	Objectives and progress .....	5
2.2.1	Overall goal and progress.....	5
2.2.2	Goals for the coming year .....	6
3.	The due diligence assessment.....	6
3.1	Introduction to the company's due diligence focus .....	6
3.2	Supply chain and business partners .....	6
3.3	Prioritisation of own operations and suppliers/business relationships .....	6
3.3.1	Own operations.....	7
3.3.2	Suppliers and business partners .....	7
3.4	Overview of the company's due diligence methodology .....	8
3.4.1	Due diligence methodology related to external suppliers and business partners .....	8
3.4.2	Due diligence methodology related to intercompany suppliers .....	9
3.4.3	Due diligence methodology related to the company's own operations .....	10
3.5	Due diligence of the company's products and services .....	10
3.5.1	Own deliveries of electrical installation work performed for HG Teknikk AS at Norwegian shipyards .....	10
3.5.2	Service – delivery of accommodation rental from external business partner .....	13
3.5.3	Service – car rental services .....	14
3.5.4	Service – delivery of accommodation rental from Hareid Elektriske AS .....	16
3.5.5	Service – life insurance .....	17
3.5.6	Overview – risk assessments related to suppliers and business partners .....	18
3.6	Conclusion – due diligence assessment.....	18
4.	Measures to stop, prevent or limit negative consequences.....	18
5.	Monitoring of measures – implementation and results .....	21
6.	Communication with affected stakeholders.....	21
7.	Recovery and indemnification .....	21
8.	Appendices.....	23
8.1	Appendix 1 Procedures for anchoring work with the Transparency Act in HG Solutions Sp. z o.o. NUF .....	23

# 1. The 2024 Transparency Act Report

## 1.1 Introduction

HG Solutions Sp. z o.o. shall annually conduct due diligence assessments in accordance with the Transparency Act and publish an account of the assessments.

The purpose of the Transparency Act is to promote companies' respect for fundamental human rights and decent working conditions.

This report accounts for the company's duty to report on the due diligence assessments conducted for 2024. The report also describes the measures assessed and implemented to reduce the risk of potentially negative impact from the company's activities and business relationships on fundamental human rights and decent working conditions.

## 1.2 Contact Information

Please direct any inquiries related to the report to:

HG Solutions Sp. z o.o

General Manager, Pawel Dubiel

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## 1.3 Obligation to report

The company is headquartered at Ul. Gwarancyjna 3 in Gdynia, Poland.

On the balance sheet date, the company had sales revenues of NOK 144 972 298, a balance sheet sum of NOK 84 640 174 and employed 130 full-time equivalents.

NOK 80 769 689 of the turnover is related to the company's activity in Norway.

The company offers goods and services in Norway and is liable to pay tax on Norway in accordance with Norwegian internal legislation. The company is therefore obligated to report for the activity of the business unit registered in Norway ( HG Solutions Sp. z o.o. NUF).

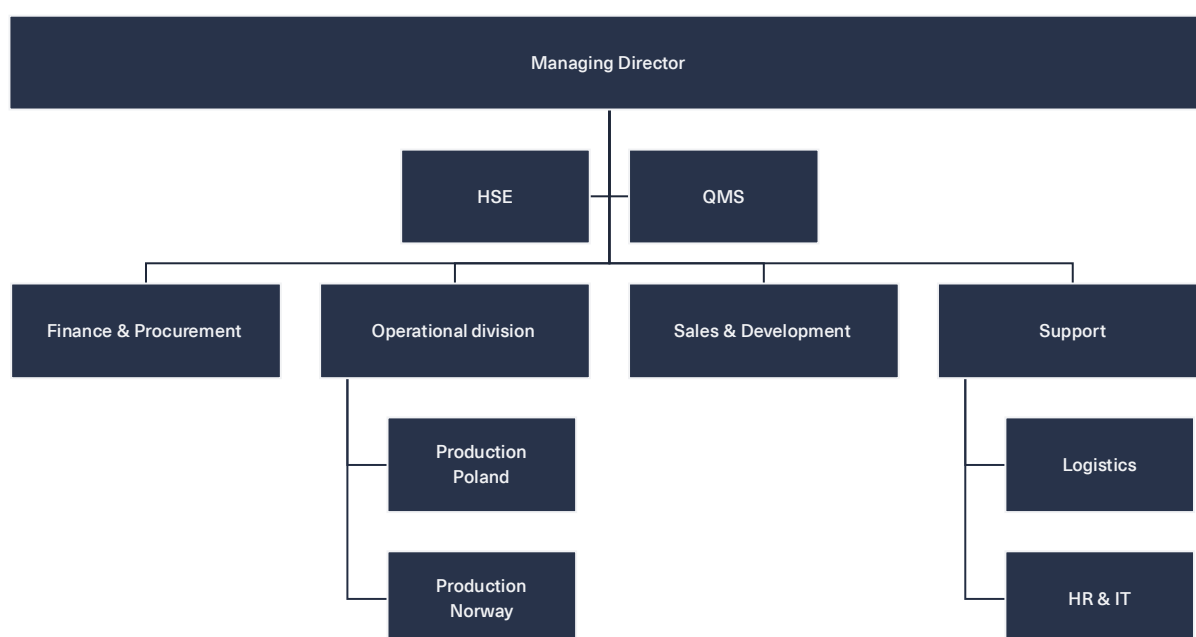
## 2. The company's activities

### 2.1 Organisation and area of operations

HG Solutions Sp. z o.o. is a subsidiary of Hareid Elektriske AS and based in Gdynia, Poland. Hareid Elektriske AS owns 60% of the shares in the company, the remaining 40% is owned by JS LTD, a company registered in Gdynia, Poland.

In 2024, the company had an operating income of NOK 145,0 million. Profit after tax was NOK 10,3 million. The company's Norwegian-registered foreign enterprise had an operating income of NOK 80,8 million in 2024. Profit before tax was NOK 3,5 million.

Organisation per 31.12.24:



The company employed 130 full-time equivalents in 2024.

HG Solutions Sp. z o.o. provides a wide range of electrical products and services for the maritime industry, mainly in Norway and Poland, with intermittent projects in other countries in Northern Europe. The business primarily delivers to major projects on new buildings and renovations. In addition, the company produces switchboards, distributions, automation and photo voltaic systems.

The company's portfolio of products and services includes:

- Electrical engineering
- Power & automation
- Electrical installation
- Services
- Retrofit & upgrading
- Project management and advisory services

## 2.2 Objectives and progress

The company has its own routines for anchoring the work related to human rights and decent working conditions, see "Routines for anchoring work with the Transparency Act" in HG Solutions Sp. z o.o. attached to this report. The routines also include a description of the company's work to meet the requirements set out in the Transparency Act.

The company's procedures have been endorsed and approved by the company's Board of Directors on 29.06.23. The routine is communicated to the company's employees and is available on the company's intranet site. The company conducts regular courses on the Transparency Act and the company's routines related to the Act.

The procedure describes how the company conducts its due diligence and assessment of measures taken. The procedures also contain information about the company's whistleblowing channels, designed to enable the uncovering of negative consequences for fundamental human rights and decent working conditions related to the company's activities, and how such information is followed up.

### 2.2.1 Overall goal and progress

The company works continuously to assess risks associated with its activities and the use of business partners (direct suppliers and other business partners). Furthermore, the company works continuously to implement measures to achieve the goals set by the company. See sections 3 and 4 of the report for information on the work done for the reporting year.

## 2.2.2 Goals for the coming year

Specific targets for the coming year:

Objective	Status
We will further develop our due diligence assessment on the basis of the experience gained during the first reporting period	In progress
We will improve the internal competence when it comes to sustainability and responsible purchasing practices.	In progress

## 3. The due diligence assessment

### 3.1 Introduction to the company's due diligence focus

HG Solutions Sp. z o.o. NUF continuously assesses the risk of negative consequences for fundamental human rights and decent working conditions related to the company's activities and business in Norway. The company continuously investigates human rights violations and violations of decent working conditions related to the company's activities in Norway.

### 3.2 Supply chain and business partners

The company had commercial relations with 40 business partners in the reporting year related to its operations in Norway. The Company's business partners are located in the following countries/geographical regions:

Country/geographical area	Number of business partners
Norway	37
Poland	3

### 3.3 Prioritisation of own operations and suppliers/business relationships

In its due diligence assessment for 2024, HG Solutions Sp. z o.o. NUF has chosen to do the following prioritisation of which parts of our own operations and which suppliers/business relationships have been included in the assessment:



### 3.3.1 Own operations

For its own operations, HG Solutions Sp. z o.o. NUF has chosen to concentrate its due diligence assessment on the degree of injury or risk of injury to workers' health or safety associated with installation assignments for HG Teknikk AS at Norwegian shipyards.

The reason for the prioritisation is that installation assignments at shipyards constitute the largest part of the company's activities during the assessment period, and it is considered to be the part of own operations where there is the greatest risk of injuries.

### 3.3.2 Suppliers and business partners

HG Solutions Sp. z o.o. NUF has chosen to prioritise due diligence assessments of the suppliers and business partners it purchases the most from and has therefore conducted due diligence assessments related to all suppliers and business partners with deliveries with a total value of more than NOK 1 million.

This means that due diligence has been carried out for 55% of the total purchasing volume associated with the company's activities in Norway.

HG Solutions Sp. z o.o. NUF has chosen to limit the mapping to first-tier suppliers in this first round of reporting.

The following suppliers have been assessed by HG Solutions Sp. Z o.o.:

Company	Deliveries	Described in section
External business partner (Norwegian company)	Rented accommodation	3.5.2
External business partner (Norwegian Company)	Car rental	3.5.3
Hareid Elektriske AS (company in Hareid Group, owning 60% of the shares in HG Solutions Sp. Z o.o.)	Rented accommodation	3.5.4
External business partner (Norwegian Company)	Life insurance	3.5.5

In addition to the assessment carried out for suppliers and business partners on the basis of delivered volumes, the company has also mapped the countries in which other suppliers

operate (see section 3.2). This mapping revealed that none of the suppliers operate in countries with high risk of human rights violations and decent working conditions (systematic violations) according to the ITUC (International Trade Union Confederation) survey for 2024. Against this background, no further mapping has been carried out of suppliers with volumes lower than NOK 1 million.

## 3.4 Overview of the company's due diligence methodology

### 3.4.1 Due diligence methodology related to external suppliers and business partners

Hareid Group is part of the Elnett Group, an alliance consisting of 19 regionally large electrical contractors. The alliance has on behalf of, and in close cooperation with, its members conducted due diligence assessments related to products and suppliers relevant to the Group's members.

HG Solutions Sp. z o.o. has largely based its due diligence assessments of product suppliers on the work done in and through the alliance, and Hareid Group has used the same methodology in the due diligence assessment of priority suppliers and business partners.

A digital platform developed by Ignite Procurement AS has been used for the mapping, simplifying the implementation of due diligence assessments in accordance with the requirements of the Transparency Act.

Preliminary assessments have been made of the risk of negative impact on fundamental human rights and decent working conditions based on a systematised overview of first-tier suppliers, business partners and other known subcontractors.

The particular steps in the assessment:

1. Based on supplier data obtained from accounting data, order confirmations and internal ERP systems, a complete overview of the company's first-tier suppliers and business partners is created. The list of first-tier suppliers is updated continuously.
2. Supplier information is enriched through third-party collaboration with professional providers of company information. Suppliers' information and financial data such as industry codes (NACE) is obtained through the digital platform.



3. Through steps 1 and 2, the company gets an overview of first-tier suppliers, business partners and other known subcontractors, with associated supplier information.
4. Using the platform's built-in risk evaluation tool, an initial risk classification of the company's first-tier suppliers, business partners and other known subcontractors is generated based on geography and industry. The risk set to "high", "medium" or "low" based on potential negative impact on fundamental human rights and decent working conditions.
5. As part of the risk mapping, the company has distributed custom questionnaires to obtain additional information, documentation and certifications from a defined set of first-tier suppliers, business partners and other known subcontractors.
6. Based on the findings in paragraphs 4 and 6, the company assesses what measures should be taken to investigate potential negative impacts on fundamental human rights and decent working conditions. The company has implemented measures where the severity and probability of injury are greatest and where the company has the best chance to enable positive development. Prioritisations are linked to the company's affiliation with and responsibility for the risk, and must be proportionate to the size, nature and context of the business.
7. The company has involved stakeholders, suppliers and business partners in implementing the measures.

Supply chain analyses have been prepared based on supplier data; the outcome of the risk assessment and information obtained from the supply chain. Section 3.5 below provides a more detailed description of the information collected and the detailed risk evaluation of the prioritised suppliers.

Factors relevant for the due diligence assessment of the company's activities and business relationships:

1. The company's operational context
2. The company's business model
3. The company's position in the supply chain
4. Type of products and services

### 3.4.2 Due diligence methodology related to intercompany suppliers

HG Solutions Sp. z o.o. NUF has conducted a survey of Hareid Elektriske AS using the methodology used for the external suppliers, as described in section 3.4.1.

Hareid Elektriske AS has conducted its own due diligence assessments in accordance with the Transparency Act. HG Solutions Sp. z o.o. NUF has also carried out its own supplementary risk assessment based on its own investigations through close dialogue with Hareid Elektriske AS regarding the accommodation rental's potential impact on the environment, mapping of employees' salaries and compliance with the Working Environment Act. HG Solutions Sp. z o.o. and Hareid Elektriske AS have, together with the other companies in the group, worked closely together on guidelines for safeguarding human rights and basic working conditions, transparency etc. and routines and assessments related to these conditions.

### 3.4.3 Due diligence methodology related to the company's own operations

In the due diligence assessment related to the injury, health and safety risk associated with installation assignments on shipyards, the company has, in cooperation with HG Teknikk AS, mapped and analysed its own HSE reports with regards to reported accidents and incidents.

HG Teknikk AS has also conducted a due diligence assessment of HG Solutions Sp. z o.o. NUF using the digital platform and methodology as described in section 3.4.1.

## 3.5 Due diligence of the company's products and services

The following provides a more detailed account of any significant risk of negative consequences for human rights and decent working conditions identified through the company's due diligence assessments. The report also covers any confirmed violations of human rights and decent working conditions.

### 3.5.1 Own deliveries of electrical installation work performed for HG Teknikk AS at Norwegian shipyards

Assessment of risk based on HG Teknikk AS's due diligence assessment of the business:

HG Teknikk AS has conducted a due diligence assessment of HG Solutions Sp. z o.o. NUF using the digital platform and methodology described in section 3.4.1.

The following initial risk assessments have been made:

#### Industry risk:

The assessment of industrial risk is based on the European Bank of Reconstruction and Development's index that links social risk to NACE codes.

HG Solutions Sp. z o.o. NUF is registered with NACE code 43.2 (Electrical installation). The company's deliveries are considered to have a low risk of negative impact on the environment, medium risk of negative impact on social conditions, resulting in an overall medium industry risk.

#### Geographical risk:

Assessment of risk based on the ITUC index of probability of internationally recognised collective labour rights being upheld by governments and employers in different countries. The methodology is rooted in standard fundamental rights in the workplace, in particular the right to freedom of association, the right to collective bargaining and the right to strike.

HG Solutions Sp. z o.o. NUF's deliveries related to installation assignments at Norwegian shipyards are considered to have a low risk of negative impact on standard fundamental rights according to the ITUC index based on geographical risk.

#### Social risk:

Assessment of risk based on Ignite's score based on quantification and compilation of industrial risk and geographic risk.

Deliveries from HG Solutions Sp. z o.o. NUF is considered to have a medium overall social risk.

#### Own risk assessment:

In addition to initial assessments of industrial, geographical and social risk, HG Teknikk AS has conducted its own additional risk assessment based on own investigations through close dialogue with HG Solutions Sp. z o.o. regarding certifications, mapping of employees' salaries and compliance with regulations for working environment and HSE. HG Teknikk AS and HG Solutions Sp. z o.o. NUF have common guidelines for safeguarding human rights and basic working conditions, transparency etc. and routines and assessments related to these matters related to the deliveries HG Solutions Sp. z o.o. NUF has to HG Teknikk AS.

The deliveries from HG Solutions Sp. z o.o. NUF are considered to have a low risk of negative impact on fundamental human rights and decent working conditions based on the risk assessment conducted by HG Teknikk AS.

#### Assessment of risk of injury or risk of harm to workers' health or safety:

In addition, the company has chosen to conduct due diligence assessments of its own operations related to the degree or risk of injury to employees' health or safety in connection with installation assignments at shipyards.

The risk of injury to employees' health or safety is followed up in the company's management system, where HSE non-conformities are continuously registered and followed up. In order to detect and reduce risk, the company reports separately on injuries with absence the following shift or day (Lost Time Injuries). In addition, all incidents where employees are exposed to electric current are followed up, regardless of subsequent absence.

During the reporting period, the company had five cases of Lost Time Injuries, as well as zero incidents involving exposure to electric current when performing installation work as a subcontractor to HG Teknikk AS:

ID	Incident	Absence (hours)
01/N/2024	An electrician worker, after walking through the shipyard gate and covering about 50 m, slipped and fell hitting the ground with his knee. Then, after leaving the social rooms and walking to the unit, he again slipped and fell twisting his foot and hitting his knee	165,0
02/N/2024	An electrician worker, while moving around the project, failed to notice the open underfloor greting, as a result of which he fell into the hole with his left foot	202,5
03/N/2024	An electrician, while moving around the unit, the employee passed by where workers from another company were installing a door frame. When the employee passed them, suddenly the door frame	60,0

	which was not secured but only leaned on fell hitting the employee's left foot.	
04/N/2024	A steelworker/ locksmith worker wishing to cut the pipe into the required sections after unhooking it from the crane hooks wanted to secure the hooks at a safe height, but during the lifting process one of the hooks snagged on a table element at the moment of tension there was an overload and the hook handle broke off which hit the worker with the force of the recoil.	37,5
05/N/2024	An electrician worker, while punching holes in the copper sheet on the machine - punching machine, mistakenly pressed the closing button which caused the punch to press against the die and led to a finger injury.	532,5

Considering the size of the company's activity and the extent and degree of reported injuries, the risk of injury to workers' health or safety associated with installation assignments at shipyards is considered to be low. The company will nevertheless work to reduce the risk further through measures as described in section 4.

### 3.5.2 Service – delivery of accommodation rental from external business partner

The company has conducted due diligence related to a Norwegian business partner, from which the company rents housing.

When mapping and assessing risk, methodology as described in section 3.4.1 has been used. The following initial risk assessments have been made:

#### Industry risk:

The assessment of industrial risk is based on the European Bank of Reconstruction and Development's index that links social risk to NACE codes.

Hareid Elektriske AS is registered with NACE code 30.111 (Building of ships above 100 gross tonnes). The deliveries are considered to have a medium risk of negative impact on the environment, high risk of negative impact on social conditions, which gives an overall high industrial risk.

#### Geographical risk:

Assessment of risk based on the ITUC index of probability of internationally recognised collective labour rights being upheld by governments and employers in different countries. The methodology is rooted in standard fundamental rights in the workplace, in particular the right to freedom of association, the right to collective bargaining and the right to strike.

The deliveries from the external business partner are considered to have a low risk of negative impact on standard fundamental rights according to the ITUC's index based on geographical risk.

#### Social risk:

Risk assessment built on Ignite's score based on quantification and compilation of industrial risk and geographic risk.

The deliveries from the external business partner are considered to have a medium overall social risk.

#### Own risk assessment:

In addition to initial assessments of industrial risk, geographical risk and social risk, HG Solutions Sp. z o.o. NUF has conducted its own additional risk assessment based on close dialogue with the business partner regarding the company's properties' impact on the environment, mapping of employees' salaries and compliance with the Working Environment Act.

The deliveries from the external business partner are considered to have a low risk of negative impact on fundamental human rights and decent working conditions based on their own risk assessment.

### 3.5.3 Service – car rental services

The company has conducted a due diligence assessment of an external Norwegian business partner providing car rental for the company's activities in Norway.

When mapping and assessing risk, methodology as described in section 3.4.1 has been used. The following initial risk assessments have been made:

#### Industry risk:

The assessment of industrial risk is based on the European Bank of Reconstruction and Development's index that links social risk to NACE codes.

The business partner is registered with NACE code 45.2 (Maintenance and repair of motor vehicles). Based on this, the deliveries are considered to have a medium risk of negative impact on the environment, low risk of negative impact on social conditions, resulting in an overall medium industrial risk.

In our opinion, the supplier's registered NACE code does not accurately describe the activity the supplier carries out as a subcontractor to HG Solutions Sp. z o.o. NUF. We consider it more appropriate to base the risk assessment of these activities on NACE code 77.11 (Car rental), which would result in an overall low industry risk.

#### Geographical risk:

Assessment of risk based on the ITUC index of probability of internationally recognised collective labour rights being upheld by governments and employers in different countries. The methodology is rooted in standard fundamental rights in the workplace, in particular the right to freedom of association, the right to collective bargaining and the right to strike.

The car rental provider operates in Norway and is considered to have a low risk of negatively impacting the standard basic rights according to the ITUC index based on geographical risk.

#### Social risk:

Risk assessment built on Ignite's score based on quantification and compilation of industrial risk and geographic risk.

The deliveries of car hire to HG Solutions Sp. z o.o. NUF are considered to have a low overall social risk.



### 3.5.4 Service – delivery of accommodation rental from Hareid Elektriske AS

The company has conducted due diligence related to Hareid Elektriske AS (company in Hareid Group, owner of 60% of the shares in HG Solutions Sp.z.o.o), from which the company rents housing.

When mapping and assessing risk, methodology as described in section 3.4.1 has been used. The following initial risk assessments have been made:

#### Industry risk:

The assessment of industrial risk is based on the European Bank of Reconstruction and Development's index that links social risk to NACE codes.

Hareid Elektriske AS is registered with NACE code 68.2 (Rental of own or rented real estate otherwise). The deliveries are considered to have a medium risk of negative impact on the environment, medium risk of negative impact on social conditions, which gives an overall medium industrial risk.

#### Geographical risk:

Assessment of risk based on the ITUC index of probability of internationally recognised collective labour rights being upheld by governments and employers in different countries. The methodology is rooted in standard fundamental rights in the workplace, in particular the right to freedom of association, the right to collective bargaining and the right to strike.

The deliveries from Hareid Elektriske AS are considered to have a low risk of negative impact on standard fundamental rights according to the ITUC's index based on geographical risk.

#### Social risk:

Risk assessment built on Ignite's score based on quantification and compilation of industrial risk and geographic risk.

The deliveries from Hareid Elektriske AS are considered to have a medium overall social risk.

#### Own risk assessment:

In addition to initial assessments of industrial risk, geographical risk and social risk, HG Solutions Sp. z o.o. NUF has conducted its own additional risk assessment based on close dialogue with Hareid Elektriske AS regarding the company's properties' impact on the environment, mapping of employees' salaries and compliance with the Working Environment Act. HG Solutions Sp. z o.o. and Hareid Elektriske AS have, together with the other companies in the group, worked closely together on guidelines for safeguarding human rights and basic working conditions, transparency etc. and routines and assessments related to these conditions.

The deliveries from Hareid Elektriske AS are considered to have a low risk of negative impact on fundamental human rights and decent working conditions based on their own risk assessment.

### 3.5.5 Service – life insurance

The company has conducted a due diligence assessment of an external Norwegian business partner providing life insurance for the company's employees in Norway.

When mapping and assessing risk, methodology as described in section 3.4.1 has been used. The following initial risk assessments have been made:

#### Industry risk:

The assessment of industrial risk is based on the European Bank of Reconstruction and Development's index that links social risk to NACE codes.

The business partner is registered with NACE code 65.11 (Insurance, reinsurance and pension funding, except compulsory social security). Based on this, the deliveries are considered to have a low risk of negative impact on the environment, low risk of negative impact on social conditions, resulting in an overall low industrial risk.

#### Geographical risk:

Assessment of risk based on the ITUC index of probability of internationally recognised collective labour rights being upheld by governments and employers in different countries. The methodology is rooted in standard fundamental rights in the workplace, in particular the right to freedom of association, the right to collective bargaining and the right to strike.

The car rental provider operates in Norway and is considered to have a low risk of negatively impacting the standard basic rights according to the ITUC index based on geographical risk.

Social risk:

Risk assessment built on Ignite's score based on quantification and compilation of industrial risk and geographic risk.

The deliveries of life insurance to HG Solutions Sp. z o.o. NUF are considered to have a low overall social risk.

### 3.5.6 Overview – risk assessments related to suppliers and business partners

Supplier/Business Partner	Country	NACE	Risk Assessment			
			Industry	Social	Geographical	Own assessment
External Business Partner	Norway	30.111	High	High	Low	Low
External Business Partner	Norway	45.200	Medium	Medium	Low	Low
Hareid Elektriske AS	Norway	65.110	Medium	Medium	Low	Low
External Business Partner	Norway	68.209	Low	Low	Low	Low

## 3.6 Conclusion – due diligence assessment

The due diligence assessment has not revealed violations of human rights/decent working conditions or significant risk of human rights/decent working conditions violations in the reporting year.

## 4. Measures to stop, prevent or limit negative consequences

In the following, the company will provide an account of the measures its activities have taken to prevent, limit or stop the identified consequences and risks identified in section 3.5.1 above.

Based on the assessments, we have implemented the following measures:

ID	Incident	Absence (hours)	Measures
01/N/2024	An electrician worker, after walking through the shipyard gate and covering about 50 m, slipped and fell hitting the ground with his knee. Then, after leaving the social rooms and walking to the unit, he again slipped and fell twisting his foot and hitting his knee	165,0	TRAINING: the accident is used as an example in raising awareness among workers to exercise extreme caution when moving around the work site. Immediately report any icy or snowy areas to avoid slips
02/N/2024	An electrician worker, while moving around the project, failed to notice the open underfloor greting, as a result of which he fell into the hole with his left foot.	202,5	TRAINING: the accident is used as an example in raising awareness among employees to take extra caution when moving around the workplace especially on the ship. Any unsecured openings should be reported immediately.
03/N/2024	An electrician, while moving around the unit, the employee passed by where workers from another company were installing a door frame. When the employee passed them, suddenly the door frame which was not secured but	60,0	TRAINING: training reiterated that it is necessary to constantly monitor the workplace also the work performed by other companies and strive to protect all elements, loads, objects from falling, in addition, designate places where you should not move due to the ongoing work, and take special care

	only leaned on fell hitting the employee's left foot		
04/N/2024	A steelworker/ locksmith worker wishing to cut the pipe into the required sections after unhooking it from the crane hooks wanted to secure the hooks at a safe height, but during the lifting process one of the hooks snagged on a table element at the moment of tension there was an overload and the hook handle broke off which hit the worker with the force of the recoil	37,5	TRAINING: training reiterated that you should constantly supervise the process of lifting, lowering loads and slings, stay at a safe distance from the transported objects and slings. Keep extreme caution and concentration on the work being performed.
05/N/2024	An electrician worker, while punching holes in the copper sheet on the machine - punching machine, mistakenly pressed the closing button which caused the punch to press against the die and led to a finger injury	532,5	Consider additionally equipping the machine with pliers to avoid operating fingers in the working area of the machine. Employees were instructed to keep extreme caution when working on machines.

## 5. Monitoring of measures – implementation and results

We continuously work to monitor the implementation and results of planned measures, and work to further develop routines for monitoring the implementation and results of risk-reducing measures.

## 6. Communication with affected stakeholders


The company has not uncovered human rights violations or breach of decent working conditions in the reporting year. Nor has the company disclosed a material risk of breach/negative consequences.

With regard to the identified (albeit low) risk of harm to workers' health or safety, the Company communicates with workers, relevant suppliers and trade unions how actual impacts have been addressed, including measures taken and the results of these measures, and uses this dialogue actively to strengthen its efforts to map and monitor the results of our work.

## 7. Recovery and indemnification

The company has not uncovered cases requiring recovery or indemnification during the reporting year.

Hareid/Gdynia, 25.06.25



Olav Haug Vikebakk  
Chairman of the Board

  
**HG Solutions Sp. z o.o.**  
Pawel Dubiel  
Managing Director

Pawel Dubiel  
Managing Director

**HG SOLUTIONS** Sp. z o.o.  
Jarek Lapkowski  
Członek Zarządu

Jarek Lapkowski  
Board Member

**HG SOLUTIONS** Sp. z o.o.  
Sebastian Banaszek  
Członek Zarządu

Sebastian Banaszek  
Board Member



## 8. Appendices

### 8.1 Appendix 1

#### Procedures for anchoring work with the Transparency Act in HG Solutions Sp. z o.o. NUF

##### 1. Introduction

The purpose of the Transparency Act is to promote companies' respect for fundamental human rights and decent working conditions in connection with production of goods and provision of services.

In addition, the Transparency Act is intended to ensure public access to information about how businesses deal with negative consequences for fundamental human rights and decent working conditions.

This procedure describes how HG Solutions Sp. z o.o. NUF anchors and works with due diligence in line with the provisions of the Transparency Act.

##### 2. Anchoring

The Board of Directors determines HG Solutions Sp. z o.o. NUF's routines for the work to be performed and the allocation of responsibility for the work to be carried out to meet the requirements of the Transparency Act.

##### 3. Board review and audit

The Board of Directors of HG Solutions Sp. z o.o. NUF shall review the company's procedures regularly. The managing director plans for this and presents the routines and any changes to these to the board.

The managing director shall once a year review the work carried out by HG Solutions Sp. z o.o. NUF, findings made, measures implemented, etc. The annual review is a matter of briefing for the board.

The managing director shall assess whether there is a need for the board's involvement in matters related to the Transparency Act beyond the annual review.

## 4. Annual reporting

The Board of Directors approves the annual report on HG Solutions Sp. z o.o. NUF's due diligence assessments and the results thereof, including their publication. The deadline for publication is at the same time as the company's annual report or no later than 30 June each year.

## 5. Due diligence

HG Solutions Sp. z o.o. NUF shall annually conduct due diligence related to our activities. This means that we must carry out investigations that are reasonable and relevant if we are to uncover possible consequences of or risks of violations of fundamental human rights or decent working conditions.

Due diligence must be carried out for our own activity, our suppliers' activities and our business partners' activities.

Due diligence must be carried out for all of our products and services.

## 6. Possible actions

Findings through due diligence shall lead to an assessment of measures that may be relevant to implement. The measures shall be suited to prevent actual violations of fundamental human rights or decent working conditions, or to reduce the risk of such violations taking place.

The effect of the measures will be evaluated.

## 7. Whistleblowing channels

HG Solutions Sp. z o.o. NUF will establish a system for reporting violations of fundamental human rights and decent working conditions. The system shall give its own employees, suppliers and business partners' employees and the general public the opportunity to report incidents.

## 8. Information and training

HG Solutions Sp. z o.o. NUF shall ensure that information about our work in accordance with the Transparency Act is available to its own employees, suppliers and business partners' employees and the general public. The information must be adapted to external stakeholders and own employees.

HG Solutions Sp. z o.o. NUF shall regularly train its own employees in the Transparency Act and the company's routines and work in accordance with the law. Participation must be documented.

Hareid/Gdynia, 29.06.23



Olav Haug Vikebakk  
Chairman of the Board



Ann Magritt Bjåstad Vikebakk  
Board Member



Jurek Lapkowski  
Członek Zarządu

Jarek Lapkowski  
Board Member



Sebastian Banazek  
Członek Zarządu

Sebastian Banazek  
Board Member



Pawel Dubiel  
Managing Director  
Pawel Dubiel  
Managing Director