



# Transparency Act - Due diligence assessment 2025

## Introduction

Origo Solutions' objective is to create value by supporting our customers in the transition towards a sustainable future and on this basis develop a profitable industrial company.

We believe that a strong focus on environmental, social and governance factors and issues is critical to our long-term success as an industrial company. We are convinced that in this respect, the interests of Origo Solutions' owners, align with those of our management, employees, customers, and the communities in which we operate.

From 2023 Origo Solutions has published an annual account of our due diligence assessment to comply with the Norwegian Transparency act that entered into force on 1<sup>st</sup> July 2022. The account has also been updated and republished in the case of significant changes to the enterprise risk assessments.

## Overall principles

Origo Solutions seeks to ensure that we operate in an environmentally sound manner, as well as ethically, responsibly, and profitably in everything we do. Origo Solutions aims to be transparent regarding all issues covered by these principles. Our governance system is based on the principles from the OECD guidelines for multinational enterprises and other relevant international guidelines.

The [OECD Guidelines for Multinational Enterprises](#) are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognized standards.

## About Origo Solutions

Origo Solutions is a technology company, supplier and integrator of control, automation, safety and data management systems and solutions to the offshore and onshore oil and gas, process, marine, and renewable energy production industries and markets.

The company has more than 40 years of experience in developing premium safety and automation solutions for monitoring, control and protection of both offshore and onshore facilities.

Our unique combination of products, engineering services and turn-key contractor competence makes us a trusted partner for clients within the energy industry.

We are located in Kristiansand (Headquarter), Arendal and Stavanger, and have a long and proud history of maintaining a high standard in working with safety and quality issues.

Origo Solutions is a HIMA Company and is the regional HIMA head office for Scandinavia.

The HIMA Group is a global independent provider of safety-related automation solutions for the process and rail industries that protect people, assets, and the environment from harm. Founded in 1908, the family-owned company is headquartered in Brühl, near Mannheim (Germany).



## Guidelines and procedures for handling adverse impacts on human rights and decent working conditions

Human rights and decent working conditions for all employees, suppliers and subcontractors are principles which cannot be compromised. Business conduct, ethical compliance and corporate responsibility are well established cornerstones in Origo Solutions' governance and compliance system.

Origo Solutions has implemented a comprehensive governance system including a strong corporate and organizational focus on compliance, HSE and other key risk areas. Origo Solutions' Board of Directors (Board) is ultimately responsible for overseeing the company's governance. Management of risks related to human rights and decent working conditions is a line responsibility starting with Origo Solutions' CEO who delegates this to line management. Reporting and revision of the guidelines and procedures are supported by the corporate management.

Origo Solutions' governance system includes the following documents:

- Code of Conduct
- Anti-Corruption Policy
- Risk Management
- Data Protection Policy
- Gifts and Business Hospitality Procedure
- IDD Procedure
- Payment Procedure
- HSE/ISEC Preparedness
- Sanctions Compliance Policy
- Whistleblower Policy
- Information Security Guidelines
- Cyber Security Policy
- HSSEQ in Origo Solutions
- Investigation
- Diversity and Inclusion (D&I) Policy
- Sustainability
- Business principles for suppliers and partners
- Business Continuity Plan

Origo Solutions' **Business principles for suppliers and partners** is available on our web site and contains fundamental requirements to do business with Origo Solutions, including the requirements related to the Transparency Act. All suppliers to Origo Solutions are required to confirm adherence through Supplier Declarations. Origo Solutions requires its suppliers and partners to extend the same requirements to their supply chain.

The business principles for suppliers and partners and the supplier declaration form requires fundamental human rights and decent working conditions for all supply chain employees associated with Origo Solutions. The business principles include expectations towards suppliers and partners on social aspects such as human rights and health and safety, anti-bribery and anti-corruption (ABAC) and environmental topics (e.g. carbon footprint).

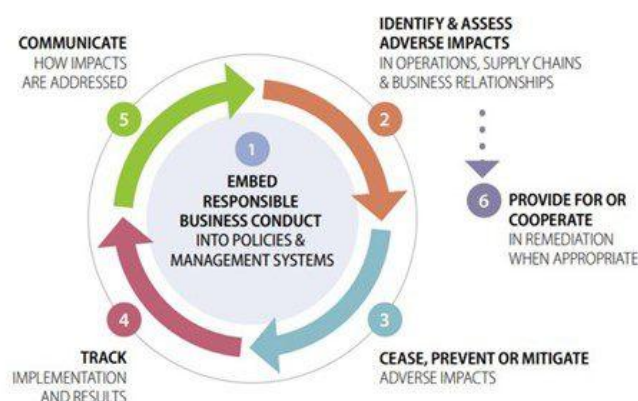
Origo Solutions has established a set of **internal procedures** to ensure compliance with the Transparency Act. This includes implementation of a yearly materiality analysis based on supplier significance and a risk analysis based on international risk indices published by e.g. the UN, UNICEF, World Bank, OECD, Transparency International. A due diligence assessment of existing suppliers is

conducted on a yearly basis. High risk elements in the supply chain will be flagged and subject to special scrutiny, which may include audits, enhanced questionnaires, and documentation. Unsatisfactory results will be reviewed, and improvement plans, suspension or termination will be considered for implementation.

## Due diligence assessment

A due diligence assessment on Origo Solutions' supply chain and business partners has been carried out during 2024. The assessment is carried out on a yearly basis and follows the OECD Due Diligence Guidelines for responsible Business Conduct.

FIGURE 1. DUE DILIGENCE PROCESS & SUPPORTING MEASURES



Origo Solutions has carried out due diligence reviews with the following overall results:

- Medium risk linked to manufacturing abroad
- Limited risk of corruption / violation of human rights further down the value chain
- Limited risk of child labour identified.

We have carried out a due diligence assessment for 2024 and no negative actual consequences were uncovered related to violation of human rights. Nor was any significant risk of negative consequences uncovered.

In accordance with the principle of proportionality in the Transparency Act a due diligence process focusing on parties with highest probability and risk of adverse impacts has been carried out. Origo Solutions' approach has been to start the due diligence assessment with a materiality analysis where suppliers who are in countries with an index of 3 or higher in accordance with the Global Rights Index - ITUC (ITUC = International Trade Union Confederation) were selected for further assessment. Materiality reviews were then conducted to focus on such suppliers with a total purchase value of over NOK 100,000 in 2024. The risk assessments were then carried out in a pre-defined risk matrix considering the various human rights elements, reviewed in light of the products or services purchased.

Some major international suppliers have been concluded to have a possible medium risk within their supply chain related to safety, pollution and waste / dangerous chemicals at manufacturers abroad,



as well as a limited risk of corruption, ref e.g. Transparency International's *Corruption Perceptions Index*.

### Measures implemented to handle adverse impacts and risks

As mentioned no adverse impacts were identified in the due diligence process, however several measures have been imposed to reduce prevent and mitigate risks of such impacts, including:

- Origo Solutions staff are required to confirm adherence to the ethical guidelines and also to undertake *UN's fight against corruption training programme* or similar.
- Suppliers are required to confirm adherence to Origo Solutions' Business principles for suppliers and partners and to extend the same requirements to their suppliers.
- Updated "Terms & Conditions of Purchase" to emphasize the duty to respect basic human rights and decent work conditions.
- Updated "Supplier Declaration" to emphasize the duty to respect basic human rights and decent work conditions.
- Results from supplier HSE audits, inspections and walkabouts are part of Origo Solutions' normal routines and are addressed directly with the supplier/subcontractor in question.

### Information requests

The aim of the Transparency Act is that companies are open and transparent about how they are working with ESG issues. Any person has the right to information from a company regarding how the company addresses actual and potential adverse impacts uncovered by its due diligence. The right to information includes both general information and information relating to a specific product or service offered by the company and the answer to such a request must be «adequate and comprehensible».


Origo Solutions intends to comply with this, and general requests are usually handled directly. Contact information is available publicly online through the website. It is also possible to contact Origo Solutions directly through our contact form at: <https://www.origo-solutions.com/about/contact> or through our whistleblowing hotline that is handled by the HIMA Group: <https://hima.reporting-channel.com/>

Kristiansand, 13<sup>th</sup> June 2025

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