

Head Energy Group

# Transparency Act.

**HEAD**  
ENERGY



2025

# Transparency Act.

Head Energy works systematically to ensure respect for fundamental human rights and decent working conditions, in line with the Norwegian Transparency Act. This statement covers the period from 1 January to 31 December 2025.

This statement applies to Head Energy Group and the Norwegian legal entities within the group that are subject to the Norwegian Transparency Act. The assessment covers Head Energy's own operations, subsidiaries where Head Energy has operational control, and relevant suppliers and business partners within the scope of the due diligence process.

Head Energy is an engineering and consulting group operating across Scandinavia and Northern Europe, delivering services within energy, infrastructure, and industry.

The work related to the Transparency Act is anchored in Head Energy's governance structure. The Board of Directors and Group Management have overall responsibility for ensuring that due diligence is conducted in accordance with applicable requirements. Operational responsibility is assigned to relevant functions within HSEQ, procurement and management, which are responsible for supplier assessments, internal follow-up, documentation and escalation of identified

risks. Findings and improvement areas are reviewed as part of the company's ongoing governance and compliance processes.

Head Energy's work is supported by internal policies, ethical guidelines, HSE procedures and procurement routines. Requirements related to ethical business conduct, respect for fundamental human rights and decent working conditions are integrated into supplier follow-up and, where relevant, contractual terms. Internal concerns may be raised through established reporting and escalation channels, and supplier-related concerns are handled through procurement and management follow-up. procedures in compliance with Section 5(a) of the Transparency Act.

If any issues are discovered that may have actual or potential consequences for fundamental human rights and decent working conditions, the procurement responsible, with the assistance of the HSEQ Manager, will immediately engage in dialogue with the supplier, either through their procurement system or, if applicable, a corporate executive. This is done in compliance with Sections 4(c/d/e/f). Transparency Act. Head Energy is also certified according to ISO 45001 (health & safety), ISO 9001 (quality), ISO 14001 (environmental).

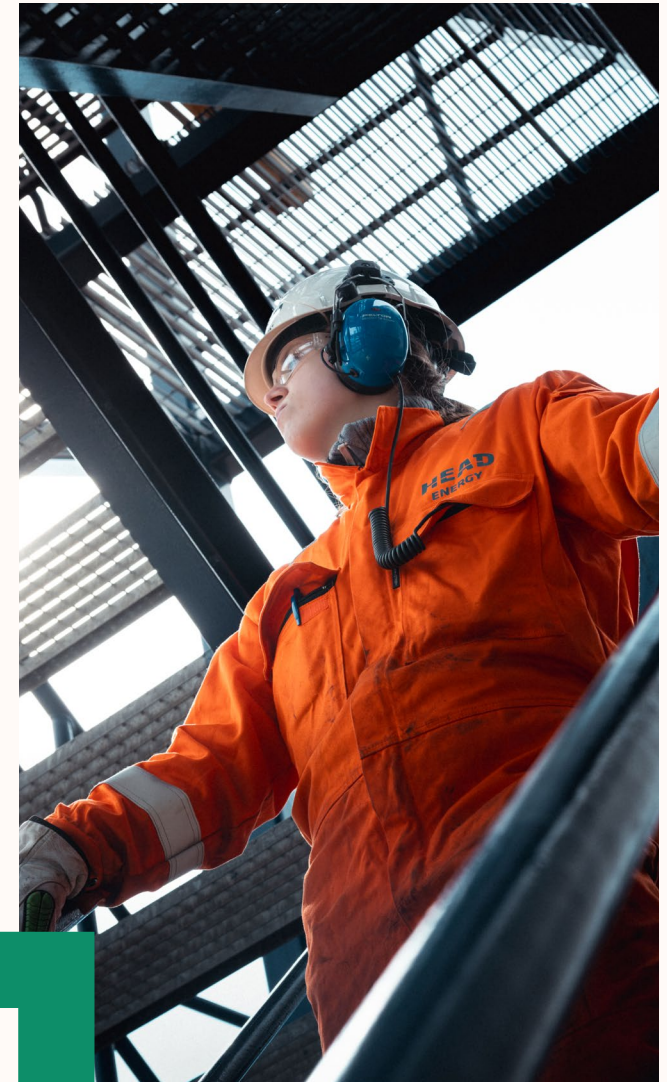
## Due Diligence Methodology

Head Energy's due diligence work is based on the OECD Guidelines for Responsible Business Conduct and follows a structured, risk-based approach.

The process includes:

- **Integration of responsible business conduct into policies and procedures**
- **Identification and assessment of potential adverse impacts**
- **Implementation of measures to prevent or mitigate risks**
- **Monitoring of effectiveness and follow-up**
- **Communication and reporting**
- **Continuous improvement of processes**

Due diligence is integrated into procurement processes, supplier follow-up, and internal governance structures.



### Internal assessment

Head Energy primarily delivers engineering and consulting services within the Nordic region, where labor rights and working conditions are strongly regulated.

The risk of adverse impacts related to the company's own operations is considered low. Employee well-being is monitored through HSE systems, internal procedures, and regular surveys.

In 2025, no serious injuries or incidents were reported.

### External Due Diligence Assessment

The main potential risks related to human rights and working conditions are linked to the company's supply chain.

Head Energy has mapped a total of 214 suppliers. Based on available information:

- **29% have published Transparency Act statements or equivalent documentation**
- **22.4% require further follow-up due to lack of available information**
- **A significant share of the remaining suppliers consists of small companies or public entities with lower risk exposure.**

As part of the due diligence assessment, targeted questionnaires were sent to 32 suppliers identified for further review.

The response rate was 18.8%, meaning that 26 suppliers did not respond and will require additional follow-up.

Low response rates represent a limitation in the current assessment and indicate gaps in supplier transparency and documentation.

### Identified Risks and Findings

Based on the due diligence activities carried out in 2025, Head Energy has not identified any actual adverse impacts on fundamental human rights or decent working conditions requiring remediation.

However, the assessment identified areas with increased uncertainty:

- **Suppliers with limited available information**
- **Suppliers that did not respond to follow-up requests**
- **Limited visibility beyond Tier 1 suppliers**

These factors represent potential risk areas and will be subject to further follow-up.

### Measures and Follow-up

To address identified gaps, Head Energy will:

- **Follow up suppliers that have not responded to questionnaires**
- **Improve supplier mapping and documentation**
- **Increase response rates in future assessments**
- **Strengthen integration of due diligence in procurement processes**

The planned measures are expected to improve supplier transparency, increase response rates, strengthen documentation of supplier compliance, and enhance Head Energy's ability to identify, prevent and mitigate risks related to fundamental human rights and decent working conditions.

### Right to Information

This statement will be made publicly available on Head Energy's website no later than 30 June 2026 and will be updated annually, or in the event of significant changes to the company's risk assessments. The statement has been reviewed and approved in accordance with Head Energy's governance procedures and signed on behalf of Head Energy Group.

For further information or inquiries related to the Transparency Act, please contact us via our website.



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