

Transparency Act report at Ventor Energi Norge AS

(covering financial year 2025, published 2026)

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1. Introduction

This report is prepared pursuant to Section 5 of the Norwegian Transparency Act (Åpenhetsloven).

The Norwegian Transparency Act aims to promote enterprises' respect for **fundamental human rights and decent working conditions**, in connection with either productions of goods or provision of services. It should also ensure that the general public have access to information regarding how enterprises address adverse impact on fundamental human rights and decent working conditions. The legislation concerns companies residing in Norway and that offer goods and services in or outside Norway, as well as the foreign enterprises that are liable to tax to Norway pursuant to internal Norway legislation.

Following the Section 3 of the Norwegian Transparency Act, Ventor Energi Norge AS qualifies as a *larger enterprise* and is therefore subject to the due diligence and reporting obligations set out in Sections 4 and 5 of the Act.

This report covers the **financial year 2025** and is published in **2026**. It outlines due-diligence activities performed during the year, identified risks, preventive and corrective measures taken, and improvement priorities for 2026 and beyond.

2. General description of the enterprise's structure

Ventor Energi Norge AS is a staffing company (bemanningsforetak) with a long term experience in supplying work force to our business partners across Norway. Our core business areas include:

- Industrial installations
- Ventilation systems
- Industrial insulation
- Steel structures
- Scaffolding systems

Employees are typically assigned to projects operated by Ventor's clients, while Ventor remains responsible for employment conditions, payroll administration, and compliance with Norwegian labour legislation.

We are **publicly approved as a staffing agency** by the Norwegian Labour Inspection Authority and operate in full compliance with Norwegian labour regulations.

Ventor works actively to ensure that **human rights, safe working conditions and ethical business practices are respected throughout its operations and business relationships**. In 2025, we continued to strengthen our internal routines, supplier engagement processes, and documentation systems to ensure consistent alignment with the Transparency Act and international due-diligence standards.

3. Due Diligence Obligations Under the Transparency Act

Ventor Energi Norge AS conducts due diligence based on:

- OECD Guidelines for Responsible Business Conduct
- ILO Declaration on Fundamental Principles and Rights at Work
- the Ten Principles of the UN Global Compact
- the company's Code of Conduct and Responsible Business Policy.

Our processes ensure:

- Non-discrimination on the basis of gender, age, disability, nationality, religion, or other protected characteristics
- Fair and compliant recruitment and placement
- Adherence to legal requirements relating to wages, working hours, and safety
- Verification of legal working age
- Mandatory HSE training for all personnel

2025 updates include:

- Improved evidence-tracking for policy implementation
- Systematic follow-up routines for high-risk processes

4. Policies and Procedures for Handling Actual and Potential Adverse Impacts

Ventor Energi Norge AS operates an integrated management system certified according to:

- **ISO 9001:2015** (Quality Management)
- **ISO 45001:2018** (Occupational Health & Safety Management)

Key internal policies supporting values, governance and responsible business include:

- Corporate Social Responsibility Policy
- Code of Conduct
- Anti-Alcohol, Anti-Drug & Anti-Corruption Policies
- Whistleblowing Policy
- HSE procedures
- Recruitment and Equal Treatment Guidelines

Risk focus areas in 2025:

- Working hours, overtime, equal pay
- Accommodation and welfare conditions
- Safety risks associated with industrial operations
- Potential ethical risks including corruption or misconduct

Ventor's due diligence work follows the principles outlined in the **OECD Due Diligence Guidance for Responsible Business Conduct**. Compliance with mentioned policies is supported through training, internal audits and management reviews.

The company's management is responsible for implementing these policies, while the **President of The Board oversees compliance with the Transparency Act and approves the annual report**.

In 2025, Ventor Energi Norge AS also maintained **Achilles Global Energy Gold Membership**, further demonstrating commitment to quality, HSE, and responsible business practices.

We continued close cooperation with **trade unions**, and labour-related decisions were discussed with elected union representatives in accordance with the Collective Agreement.

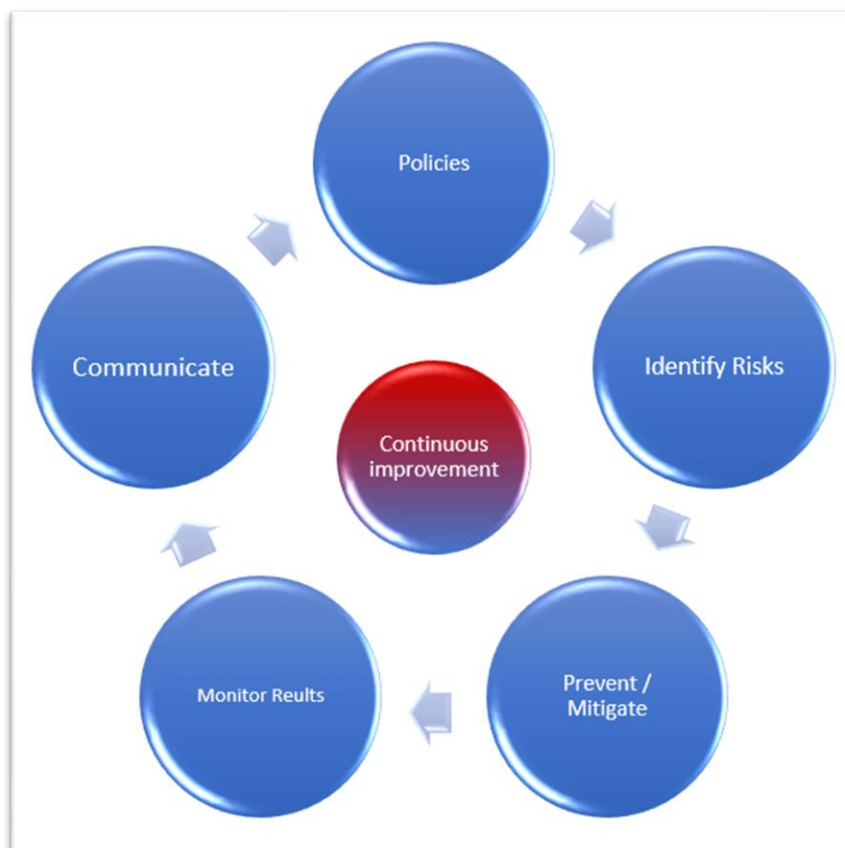
5. Due Diligence Process

Risk assessments are conducted through internal compliance reviews, dialogue with employees and clients, monitoring of working conditions, and evaluation of suppliers and subcontractors. Information from whistleblowing channels, HSE reporting systems, and feedback from workforce representatives is also considered when assessing potential risks.

We expect all business partners to follow our standards on safety, human rights, ethical behaviour, and environmental compliance.

Ventor's due diligence process follows the OECD framework and includes the following steps:

1. Establish policies and governance structures.
2. Identify and assess risks to human rights and working conditions.
3. Implement measures to prevent or mitigate risks.
4. Monitor effectiveness of implemented measures.
5. Communicate results and ensure transparency.



This process is integrated into the company's operational procedures and forms part of Venter's ongoing compliance and risk management work.

Venter's responsible business practices are based on the values defined in the company's **Code of Conduct**:

- integrity
- safety
- quality
- respect
- social responsibility.

The **Code of Conduct** applies to all employees and forms part of the company's Integrated Management System and operational procedures.

6. Measures Implemented and Results

During the reporting period Venter implemented measures to strengthen responsible business practices, including:

- review of supplier relationships and contractual requirements related to labour standards,
- monitoring of accommodation provided to employees,
- cooperation with clients regarding workplace safety and compliance with HSE procedures at client-controlled worksites,
- internal training and awareness activities related to ethical standards, responsible business conduct, and the Code of Conduct,
- maintaining whistleblowing procedures.

As part of the due diligence process, Venter also monitored employment conditions including wages, working hours, and contract compliance for employees assigned to projects.

Based on the due diligence assessments conducted during the reporting period, **no significant violations of fundamental human rights or decent working conditions were identified within Venter's own operations.**

Venter is committed to **continuous improvement** of its due diligence processes.

Planned initiatives include:

- continued training on responsible business conduct and ethical standards,

- strengthening internal reporting and follow-up mechanisms,
- further development of documentation and monitoring procedures related to business partners compliance.

7. Risk Assessment and Priority Areas

Ventor regularly assesses potential risks related to **human rights and decent working conditions**. In accordance with the OECD due diligence framework, Ventor assesses whether potential impacts may be caused by the company's own activities, contributed to through operational practices, or directly linked to the company through business relationships such as clients or suppliers. As a staffing company, risks related to employment conditions are primarily within Ventor's direct responsibility as employer, while risks related to working conditions at client-controlled sites or supplier practices are typically risks to which the company may be directly linked.

The following areas have been identified as **priority risks** based on the company's business model and operational context.

a) High-impact risks - these risks have the **greatest potential negative consequences** for workers and therefore receive the highest priority.

- Workplace safety - risks associated with physical injuries, unsafe conditions, insufficient protective measures, or hazardous environments. These risks require **rigorous HSE controls, continuous monitoring, and proactive mitigation**.
- Employment conditions – risks related to working hours, fair pay, employment contracts, equal treatment, and compliance with labour legislation. Since these directly affect workers' rights and well-being, they are treated as **high-impact risks**.

These risks are considered a priority because Ventor acts as employer.

b) Medium-impact risks

- Accommodation standards - these risks relate to housing quality, hygiene, privacy, and welfare conditions for temporary or migrant workers. Poor accommodation can significantly affect worker welfare, making this a **medium-impact risk requiring active oversight**.

c) Lower-impact risks

- Clients practices - these include general compliance with codes of conduct, documentation quality, and adherence to responsible-business requirements. While important, these risks generally have **lower direct impact on workers**, though they still require monitoring through clients due-diligence routines.

Ventor promotes a **Zero Accident culture** and requires compliance with HSE standards.

8. Communication and cooperation

We make every effort to ensure that all of our business partners share our commitment to safety, business integrity, respect for human rights and compliance. We also strive to ensure that they act in accordance with provisions in force, with respect to human rights and environment. We conduct due diligence to ensure our business partners adhere to human rights standards which includes monitoring and addressing any potential human rights risks within organization we cooperate with.

We expect our business partners to inform us of any current negative impacts on fundamental human rights or decent working conditions that they are aware of in their operations.

Ventor Energi Norge AS has established a channel for reporting irregularities or concerns. The website <https://ventor.ethics.life/> is available 24/7 for our employees, clients, partners and others who wish to report.

In accordance with **Section 6 of the Norwegian Transparency Act**, anyone may request information regarding how Ventor addresses potential adverse impacts on human rights and working conditions.

Ventor will respond within **three weeks**, unless the request requires additional time as permitted under the Act.

9. Summary

Ventor Energi Norge AS remains committed to continuously improving its due diligence processes in line with the Norwegian Transparency Act, OECD Guidelines, and the company's Code of Conduct. The company will continue strengthening internal procedures, supplier engagement, and monitoring mechanisms to ensure early identification and mitigation of

potential risks related to fundamental human rights and decent working conditions. Throughout 2025, we did not uncover any incidents of violations of human rights or decent working conditions, either in our own operations or at our business partners. The priority in 2026 is to continue strengthening internal routines and procedures for increasing control and early detection of potential violations of fundamental human rights and decent working conditions.

This report has been reviewed and approved by the:

President of the Management Board —Piotr Urbanik