



THE TRANSPARENCY ACT

Due diligence assessment 2024





The Transparency Act and work with basic human rights and decent working conditions (Åpenhetsloven) entered into force on 01 July 2022.

Polynt Composites Norway AS (hereinafter referred to as PC Norway AS) is covered by the scope of the Transparency Act, cf. Åpenhetsloven §2 and 3.

PC Norway AS is required to carry out due diligence assessments with the aim of identifying actual and possible negative consequences for basic human rights and decent working conditions, see §4, letters a-f. Pursuant §5 of the Act, the results of the due diligence assessments must be made public through an annual report.

This document contains an account of the due diligence assessments that the company has carried out in the period from 01 January 2023 to 30 June 2024.

The purpose of the due diligence assessments is to give the general public insight into how the company has carried out the due diligence assessments, the key findings and what measures the company has implemented.

The report is structured as follows:

- **GENERAL INFORMATION**

Contains a description of PC Norway AS, operating area, market area, guidelines and procedures for handling and following up on the Transparency Act.

- **NEGATIVE CONSEQUENCES AND RISKS**

Method for due diligence assessments, information on actual negative consequences and significant risks, as well as the results of the due diligence assessments PC Norway AS has carried out.

- **MEASURES**

Contains an account of measures PC Norway AS has implemented to follow up the results from the due diligence assessments, as well as prioritized areas for further development of the due diligence assessments.



COMPANY - GENERAL INFORMATION

▪ Organization

PC Norway AS is part of a global concern, Polynt S.p.A., with head office in Scanzorosciate in Italia.

▪ Products, services, markets

PC Norway AS is a producer of unsaturated Polyester Resin, Gelcoat and Bonding paste for the composites industry, selling products to customers mainly in Norway and Europe.

Raw materials for PC Norway AS's production are chemicals imported mainly from European producers and distributors.

▪ Anchored work with transparency act

Work with the Transparency Act is anchored in the board, locally in PC Norway AS and centrally in Polynt Group.

Locally: «Policy for PC Norway AS's work for human rights and decent working conditions (Transparency Act)» and in the company's Personnel Handbook.

General Manager and responsible for HR, Logistics and HSE follow up on routines and reporting to comply with the Transparency Act.

The Group policies to be found on Polynt web site are:

- Whistleblowing
- Anticorruption and Bribery
- ESG - Environmental, Social & Governance
- HSE
- Labor and Human Rights
- Ethical code
- Supplier Code of Conduct

[Executive summary | Polynt Group](#)

For PC Norway AS, the General Manager has been appointed as main contact for inquiries regarding the Transparency Act.

Centrally: <https://www.polynt.com/sustainability/sustainability-statement-and-scoring/>

Polynt Group works in accordance with ESG. A separate department has been created centrally for this work. All companies, including PC Norway AS in Fredrikstad, which is part of the Polynt Group contribute to mappings regarding environment, labor and human rights, ethics, and sustainable procurement.

The result of this work has given us a rating in Ecovadis for 2023 of 52/100 points and a bronze medal.



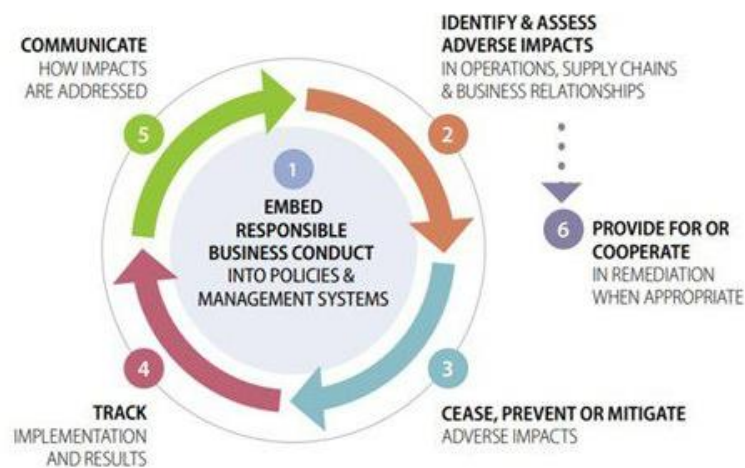
- **Notification channels and complaint mechanisms**

Locally: The PC Norway AS has established "Committee for equality and discrimination" with representatives from HR, HSE, Administration, Production and Safety Representative.

Employee interviews are conducted annually.



DUE DILIGENCES AND RISK ASSESSMENTS ROUTINES



PC Norway AS is ISO 9001 certified. In the company's quality assurance system, a job description has been prepared with instructions for carrying out Due Diligences assessment in accordance with the Transparency Act.

An overview of all suppliers of goods and services to the company for the year 2023 has been prepared. Based on this overview, different assumed risks as working conditions, industry, country of origin, assumptions and based on generally known information, suppliers will be prioritized for Due Diligence.

The suppliers are divided into groups:

- Raw material suppliers, producers and distributors of chemicals, packaging etc.
- Transport services, bulk and packed goods. We have selected transport services based on the knowledge of the EU mobility package who will focus on improving the regulations and enforcement related to working conditions and operations within road transport.
- Purchase of materials (general), working clothes, safety equipment and office supplies.
- Purchase of services hired personnel.

Locally: Supplier Code of Conduct is sent and followed up.

A covering letter has been prepared with reference to the Transparency Act and Norwegian Law (Åpenhetsloven). A questionnaire is prepared and sent to suppliers where we ensure that we work preventively with a view to due diligence assessments.

https://www.polynt.com/wp-content/uploads/2023/02/Supplier-Code-of-Conduct_for-website.pdf

Based on feedback to the Due Diligence assessment form, a risk assessment is made. ESG team sends and follows up on Supplier Code of Conduct for Polynt Group-based agreements and contracts.



DUE DILIGENCES – WORK CARRIED OUT/IN PROGRESS

- **Internal company conditions**

PC Norway AS focuses on the working environment and safety and works according to the following priorities: 1 Safety, 2 Quality and 3 Efficiency.

The company has rules for the use of work clothes and protective equipment that must be followed by all employees and visitors.

The company is connected to health services and health checks are carried out for all employees.

The occupational health service carries out local measurements of dust, noise, and vibration in risk areas.

Centrally there is collaboration with the ESG team in the Polynt Group for the company's various functions in terms of sustainability and gender equality. This includes work with human rights such as salary ratio between gender and job groups, parental leave and whether we have minority or vulnerable groups, and about conducting employee interviews.

Annually, the "Equality and discrimination committee» conducts a survey among employees to uncover actual or potential negative consequences/discrimination related to equality and discrimination, and to be able to take measures.

Questions that were covered:

- Recruitment
- Promotion and development opportunities
- Wages and working conditions.
- Facilitation
- Possibility to combine working life and family life.
- Harassment, sexual harassment, and gender-based violence
- Work environment

Based on answers to the survey, measures and a follow-up plan have been drawn up.

Employee interviews have been conducted with all employees in accordance with ISO 9001.

Action items from the survey have had special focus during employee interviews.

The survey revealed a need for more information and various measures for the employees related to the questions in the survey. All employees have access to our Personnel Handbook where the necessary information is available. It is encouraged to use the book and consult the manager with questions, in addition to information being provided at departmental meetings.



- External conditions

The company uses a separate form for risk assessments of suppliers. Prioritization of which suppliers are risk assessed is based on an overview of suppliers of goods and services.

Selection of suppliers is, for example, based on:

- Industry
- Low wage occupation
- Origin
- Size of suppliers

In the form for risk assessment of suppliers, severity, probability, and the company's ability to influence are assessed for risks we believe may be present.

We base our knowledge of potential risks on media and websites referred to by the Norwegian authorities. A high score and a high degree of influence for the company are prioritized in relation to further control and possible measures.

A questionnaire with the following points was used in 2023/2024 to survey suppliers:

1		CETIFICATION	ANSWER	COMMENTS
1.1	Is the company certified according to NS ISO 9001?			
1.2	Is the company certified according to NS ISO 14001?			
1.3	Is the company evaluated according to EcoVadis? If youes, please fill in your points			
TOTAL(of 100)		ENVIRONMENT	HUMAN RIGHTS	ETHICS SUSTAINABILITY
2		LEADERSHIP, HUMAN RIGHTS, SUSTAINABILITY	ANSWER	COMMENTS
2.1	Does the company have ethical guidelines to safeguard human rights in its own company?			
2.2	Does the company follow the regulations for health, environment and safety in its own operations?			
2.3	Has the company designated a responsible person for sustainability in the business?			
3		SUPPLY CHAIN, HUMAN RIGHTS, SUSTAINABILITY	ANSWER	COMMENTS
3.1	Does the company use ethical contract terms (supplier declaration, code of conduct, purchasing conditions) towards its suppliers?			
3.2	Does the company carry out a due diligence assessment in their supply chain, including an assessment of the risk of human rights violations?			
3.3	Explain what is the basis for assessing risk (country, production process, history of breaches etc.) according to the companies' assessment.			
3.4	Through due diligence assessments, has the compny made discoveries in your supply chain (goods, products, subcontractors) that you beleive have a high risk of human rights violations?			
3.5	Describe what findings the company has made that you consider to be in breach of human rights.			
3.6	Describe what has been done to improve the situation for those affected, and to avoid it in the future.			

The questionnaire is sent to a selection of suppliers. In contrast to last year and start of the Transparency Act, we now experience a broader knowledge to “Åpenhetsloven” and its content amongst the suppliers.

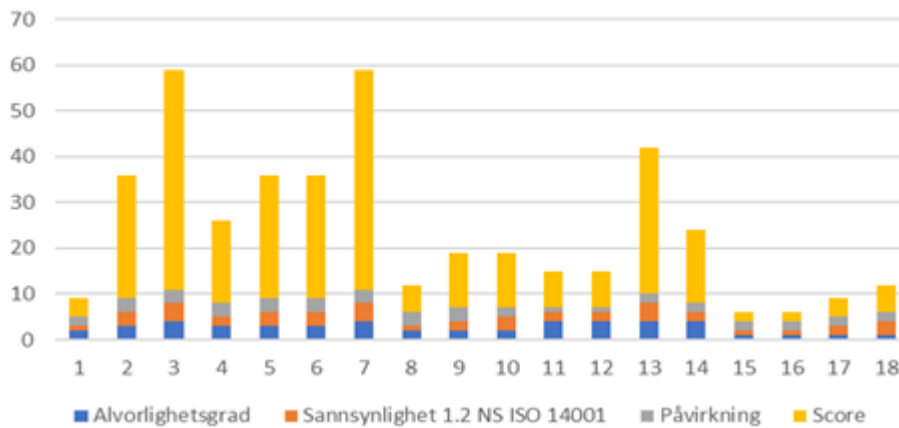


There is an improved understanding for the questionnaire and feedback is received in a timely manner from most suppliers.

The content of the feedback is clearer, which show an anchoring in the companies and also that we benefit from having audited our questionnaire.

In many cases we also receive documentation with reference to Ethical Trade and the companies Code of Conduct. Feedback from suppliers gives us basis for risk evaluation and possibility to systemize.

RISK ASSESSMENT BASED ON FEEDBACK



This form of mapping is something we will work on continuously.

Centrally, the Group ESG team has sent questionnaires to suppliers with Group contracts/agreements, this is done every other year.



DUE DILIGENCES – CONSEQUENCES OF NEGATIVE FEEDBACK

If violations of human rights and decent working conditions are uncovered, it will be implemented measures to stop, prevent and limit negative consequences based on the company's assessments.

Measures can, for example, be:

- Encourage changed working conditions, routines etc;
- Change of supplier

To date, no feedback has been received about objectionable conditions from the questionnaires sent to suppliers. We have not uncovered any violations of human rights and decent working conditions. 3 suppliers have not provided feedback, which means that they receive a high score compared to the remaining suppliers.

Based on this, these suppliers will be followed up continuously so that we can make sure that there are no objectionable conditions. At the same time, we will start working on alternative suppliers if this is possible due in view of our requirements.

Fredrikstad, 06.06.2024

Signed by the BoD:

Maurizio Leonardi - Chairman of the Board

Njål Vonen - Board member