

The Norwegian transparency act

The Norwegian Transparency Act (Åpenhetsloven) came into effect July 1st, 2022. The act applies to larger enterprises that are resident in Norway, and that offer goods and services in or outside of Norway. The Transparency act shall promote the companies respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. It shall also ensure that the general public have access to information about how businesses deal with negative consequences for fundamental human rights and decent working conditions. The companies that are applicable to the law shall execute a due diligence assessment of its vendors and business partners on these subjects.

Bulk Infrastructure is in accordance with the Transparency act, obliged to perform such regular due diligence assessments in accordance with OECDs Guidelines for Multinational Enterprises, cf. Section 4. Furthermore, we have an obligation to provide information to the public. This implies that any person, upon written request, has the right to gain information regarding how we address actual and potential adverse impacts according to section 4, cf. Section 6. The account shall be updated and published on our website no later than June 30th of each year.

Our due diligence assessments will be executed in accordance with OECDs Guidance and will consist of the following steps:

Step one: Bulk Infrastructure will anchor accountability internally by updating our guidelines and management systems. This implies that every process, documentation and draft connected to procurement, sales and other business partnerships will be revised. By doing this, we ensure that our processes take due diligence assessments into account, including partner commitments.

Step two: Bulk infrastructure will identify and asses actual and potential adverse impacts on fundamental human rights and decent working conditions that have either caused by or contributed toward, or that are directly linked, with our operations, products or services, via our supply chain or our business partners.

We will consider the following three conditions:

1. **Risk** for adverse impacts on fundamental human rights and/or decent working conditions. How extensive the assessment, will be based on how big the risk is. The severity will be defined by which type of service or what kind of product, our knowledge of the vendor etc. What applies in particular to products, will the severity also be defined by the following points: producer, country of manufacture, country of origin etc. Bulk infrastructure will use The Norwegian Agency for public and Financial Management's (DFØ) high risk list during this mapping.
2. **Consequences** of the adverse impacts. The more serious consequences the potential adverse impact will have for individuals or groups, the more comprehensive the assessments.
3. Our **ability to influence** the case. The extent of the assessments and the ability to influence, will for instance depend on the size of the business partnership.

Step three: If adverse impacts on fundamental human rights and decent working conditions are detected, Bulk infrastructure will prevent, reduce or stop the damage. The actions will be various, e.g small actions like extra follow-up and reporting of the supplier, to greater actions like sanctions, or as a last resort, termination of the collaboration.

Step four: Bulk infrastructure will monitor the implementation of actions, and the results accomplished by the actions.

Step five: Bulk infrastructure will communicate the actions and the results together with further actions of the assessments. This will be published on our website.

Step six: Bulk infrastructure, will, if necessary, cooperate regarding recovery and compensation wherever this is needed.

These assessments will be executed throughout the next ten months. Results and further actions will be published on our website by 30 June 2023.

