

Transparency act 2023



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1. Introduction

1.1 Background information on the Transparency Act

The Transparency Act came into effect on July 1, 2022, and requires several Norwegian companies to have a relationship with how their business operations may impact fundamental human rights and decent working conditions. The background for this law is a clear expectation from the authorities, society, and clients that businesses should act with increased responsibility throughout their value chain.

The purpose of the Transparency Act is to promote companies' respect for fundamental human rights and decent working conditions in connection with the production of goods and delivery of services.

1.2 Purpose of the report

The purpose of this report is to provide stakeholders and other interested parties with insight into the SeaBird Exploration's operations and performance, including financial, environmental, and social aspects. The report provides information on our strategies, goals, and achievements, as well as any challenges or risks we face. The purpose of this report is also to comply with reporting and transparency requirements from authorities or regulatory bodies, as well as to improve the SeaBird Exploration's reputation and trust among stakeholders and society as a whole.

1.3 Scope of the report

The scope of this report will focus on the company's policies and practices related to respecting human rights throughout its operations and supply chain. The report includes information on:

- Human rights risks and impact assessments
- Policies and procedures related to human rights, including any codes of conduct or standards adopted by the company
- Training and awareness-raising activities for employees and suppliers related to human rights
- Grievance mechanisms for addressing human rights abuses or violations
- Due diligence processes for identifying and mitigating human rights risks in the supply chain
- Performance indicators and targets for improving the company's human rights practices over time.

Overall, the report provides a comprehensive and transparent account of the company's human rights practices, including any shortcomings or areas for improvement

2. Overview of Transparency Act

2.1 Explanation of the act

The Norwegian Transparency Act (offisielllovdata.no/lov/2020-06-19-43) was first passed in June 2020 and became effective on January 1, 2021. The Act aims to promote transparency and accountability in Norwegian business operations, particularly in relation to supply chains and human rights. It requires large companies to report on their efforts to identify and address risks of negative impacts on human rights, including forced labor, child labor, and other human rights violations, in their operations and supply chains.

In June 2021, the Norwegian Parliament passed an amendment to the Transparency Act (Prop. 161 L (2020-2021)) to extend the reporting requirements to include environmental risks and impacts. The amendment requires large

companies to report on their efforts to identify and address environmental risks and impacts in their operations and supply chains, including greenhouse gas emissions, waste management, and water use.

The reporting requirements under the Transparency Act apply to companies with more than 250 employees or with an annual turnover exceeding NOK 70 million (approximately USD 8 million) and are required to be included in the annual report or in a separate report published on the company's website.

The Norwegian government has stated that the Transparency Act is part of its broader efforts to promote sustainable business practices and protect human rights and the environment.

2.2 Objectives of the act

The objectives of the Norwegian Transparency Act are to promote transparency and accountability in business operations, with a particular focus on identifying and addressing risks of negative impacts on human rights and the environment in supply chains.

The Act requires large companies to report on their efforts to identify and address these risks, including forced labour, child labour, and other human rights violations, as well as environmental risks and impacts, such as greenhouse gas emissions, waste management, and water use.

By requiring companies to report on these issues, the Act aims to increase awareness and understanding of the potential human rights and environmental impacts of business operations and supply chains, and to encourage companies to take steps to prevent and mitigate these risks. The Act also aims to provide stakeholders, including investors, clients, and civil society organisations, with information to help them make informed decisions about companies and their practices. Ultimately, the objective of the Transparency Act is to promote sustainable business practices and protect human rights and the environment.

2.3 Requirements for compliance

To comply with the Transparency Act, companies must provide a report that includes the following information:

1. A description of the company's policies and practices for identifying and addressing risks of negative impacts on human rights and the environment in its operations and supply chains.
2. An assessment of the company's actual and potential negative impacts on human rights and the environment, including an analysis of risks and impacts in its supply chain.
3. A description of the measures the company has taken to prevent and mitigate negative impacts on human rights and the environment, including information on due diligence processes, risk assessments, and remediation efforts.
4. A description of the company's engagement with stakeholders, including workers, local communities, and civil society organisations, to identify and address risks of negative impacts on human rights and the environment.
5. A description of the company's monitoring and evaluation mechanisms for assessing the effectiveness of its measures to prevent and mitigate negative impacts on human rights and the environment.
6. A statement of assurance by the company's management that the report is accurate and complete.

The Transparency Act requires that the report be included in the company's annual report or in a separate report published on the company's website. Companies that fail to comply with the reporting requirements may be subject to fines or other sanctions.

2.4 Impact on businesses

The impact of the Norwegian Transparency Act on businesses depends on the specific company and its operations. However, in general, the Act has several potential impacts on businesses, including:

Increased awareness and understanding of human rights and environmental risks: The reporting requirements of the Transparency Act require companies to conduct a thorough assessment of their operations and supply chains to identify and address risks of negative impacts on human rights and the environment. This increases the awareness and understanding of potential risks and impacts and encourages companies to take steps to prevent and mitigate them.

Increased transparency and accountability: The Transparency Act requires companies to provide detailed information on their policies, practices, and efforts to prevent and mitigate negative impacts on human rights and the environment. This increases transparency and accountability and helps stakeholders, including investors, clients, and civil society organisations, make informed decisions about companies and their practices.

Reputational risks: Companies that fail to comply with the reporting requirements or are found to have negative impacts on human rights or the environment could face reputational risks, which could harm their brand and affect client and investor confidence.

Increased costs: Companies may need to invest in additional resources, such as staff or systems, to comply with the reporting requirements of the Transparency Act. This could result in increased costs for businesses.

Overall, the impact of the Norwegian Transparency Act on businesses is likely to be positive in the end, as it encourages sustainable business practices, protects human rights and the environment, and promotes transparency and accountability. However, in the short term, some companies may face challenges in complying with the reporting requirements and implementing measures to prevent and mitigate negative impacts on human rights and the environment. It is important for businesses to proactively assess their operations, identify risks, and develop strategies to address them in order to navigate the impact of the Transparency Act effectively.

3. Implementation of Transparency Act by the Company

3.1 Steps taken by the company to comply with the act

SeaBird Exploration is a company managing ships and as such obliged to follow the International Safety Management Code (ISM), which means we need to have a safety management system. This system provides with a tool for among others handling of controlled document as policies, procedures, etc. Our section of governance documents contains:

- Code of conduct
- Mission statement
- Policies on:
 - Anti-harassment
 - Health, safety and environment
 - Quality
 - Right to refuse work
 - Security
 - Smoking
 - Substance abuse
 - Whistle-blower
 - Working alone

Risk assessments are an integral part of how we do business. Already on tender stage, a risk assessment is performed, where the following areas of activities are assessed: opportunities, general, client, health, safety, security, environment, CSR, emergency response and contingency, technology and equipment, logistics, subcontractors/partners, operation, maritime, legal and contractual, finance, personnel and ICT. Within CSR the following is considered: local content requirements, politically inconvenient regime, child labour, medevac facilities and possibilities, local CSR regime and local information campaign.

Our values

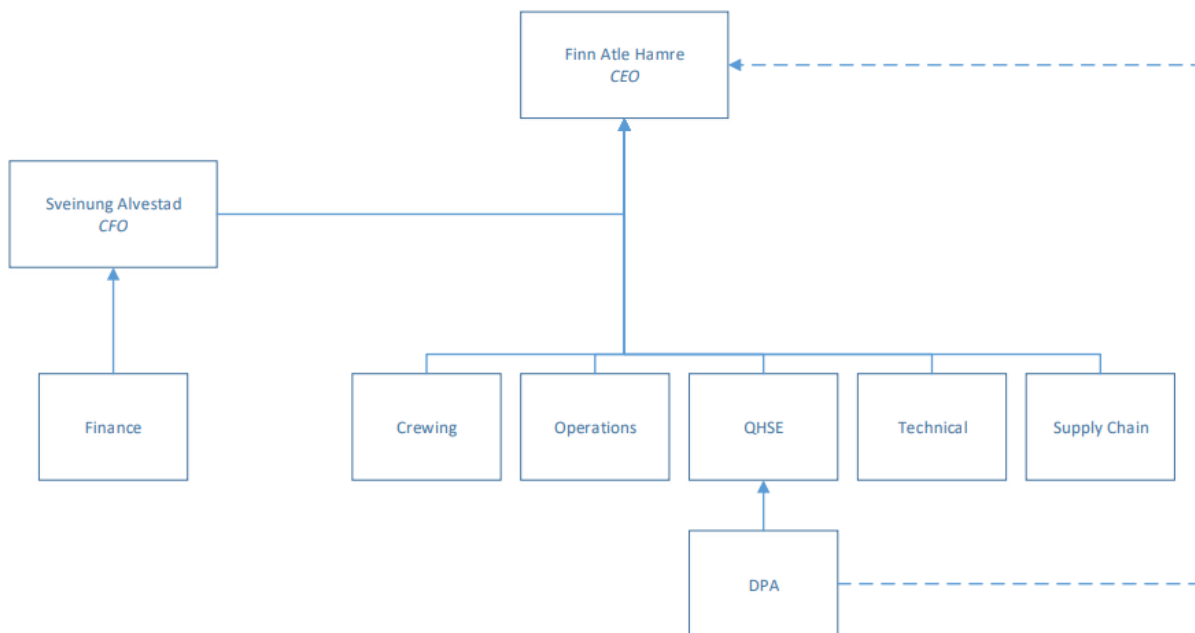
Integrity: We treat everyone involved in the organisation - staff, stakeholders, and customers alike - with dignity and respect. We are truthful and candid and endeavour to keep our promises and deliver on our commitments.

Commitment. We are committed to creating a culture that values individual and collective energy, spirit, leadership, creativity and innovation.

Excellence: In everything that we do, we search for excellence and continuous improvement to ensure client satisfaction and business success.

Organisation

SeaBird Exploration is organised as follows:



Whistleblowing

SeaBird Exploration has developed a policy for whistleblowing in order to prevent or detect and correct improper activities, encourage all SeaBird employees and contractor personnel to report what he or she in good faith believes to be a material violation of law or policy or questionable business or financial activities by any SeaBird employees. This included members of line management and senior management, and ensures that a formal reporting process is established and to protect Reporting Individuals from retaliatory action.

This procedure is also available for external parties, for example suppliers and can be reach on our public webpage.

SeaBird Exploration conducts yearly internal and external audits to ensure that we follow our own and regulatory standards.

Training

SeaBird Exploration has pre-defined training requirements for both office and vessels. All job descriptions define what is expected in terms of education and experience. In addition, a matrix of required training to be taken ad hoc or annually is part of our safety management system, and subject for yearly review. Last additions to the training matrix concern cyber security and anti-corruption.

Management system

As a ship management company, we are controlled by regulators to have a safety management system in place. This system is approved by Class society and is subject to yearly audit, both internal and external. In addition, we are audited by clients and contractors on a regular basis. The safety management system contains among others document control, incident reporting, management of change, risk assessments, system of permit to work and all our processes and procedures. All processes and procedures are reviewed on an annually basis. The safety management system also includes handling and follow-up of any findings from any kinds of audits.

Handling of deficits

Any kind of incidents or deviation from our standard operations shall be reported and analysed with the purpose of improving health, safety, environmental, security and quality performance. The process covers the reporting requirements defined in the ISM Code, ISPS Code, MLC, ISO standards. All personal injuries, spills, property damages, non-conformities and near-misses shall be reported and considered for investigation as per our Incident Management Matrix.

Knowledge sharing

Our safety management system allows the possibility to distribute the acquired knowledge within in the fleet. This is encouraged through procedures, and the question is automatically raised through the handling of incidents. For safety observations, the possibility would be same, in addition good practice and improvement suggestions are categories to be used.

Definition of risk parameters

Risk parameters for human rights violations in the supply chain may vary depending on the industry and geographic area. However, some common risk parameters are:

- Geographical location: Certain areas may have a higher risk of human rights violations, such as countries with poor human rights records, areas with political unrest or conflict, or areas with high labor migration.
- Working conditions: Poor working conditions can lead to human rights violations, such as forced labor, child labor, unfair wages, long working hours, hazardous working conditions, or lack of union rights.
- Environmental issues: Irresponsible environmental practices can also lead to human rights violations, such as pollution of water, air, and soil, or destruction of natural areas and indigenous lands.
- Business practices: Some business practices can also have a negative impact on human rights, such as corruption, bribery, or exploitation of the company's power to pressure suppliers.
- Political involvement: Some companies may also be involved in political activity that can lead to human rights violations, such as support for authoritarian regimes or illegal activities that may threaten human rights.

It is important to identify these risk parameters to be able to map and address potential risks in the supply chain to ensure that the company and its suppliers comply with international human rights standards.

SeaBird Exploration has developed a questionnaire to be used for evaluation of suppliers. The questionnaire contains questions on their quality management system, health and safety, environmental management system, corporate social responsibility (CSR) and financial information. The CSR part has the following questions:

- Does your company have a Corporate Social Responsibility policy? Please provide document
- Does your company subscribe to the principles of the United Nations Global Compact?
- Are you familiar with the prohibitions of the United States Foreign Corrupt Practices Act (FPCA), UK Bribery Act and other anti-corruption laws?
- Has your company ever been subject of an investigation or been accused of violating the FCPA, UK Bribery Act or any applicable anti-corruption laws or engaging in any practice which could be construed as an improper payment to a public
- Have any of your company staff or their close family ever had ties with Public Officials
- Has your company been subject to a due diligence review by TRACE (<https://www.traceinternational.org/>)?
- How do you prevent corruption within your organisation?
- Do you provide training to your employees aimed at anti-corruption?
- What is your policy on anti-discrimination?
- Are all your workers above the age of 15 years, or 18 years for offshore work?
- What is your policy on forced labour?
- Do you acknowledge the right of workers to adopt collective bargaining?
- What is your policy on ethical conduct?
- Do you have a mechanism in place for employees to report instances of non-compliance to your CSR principles or non-ethical behaviour?
- Has your company been subject to an investigation related to any CSR non-compliance in the past five years?
- Do you require your own suppliers and contractors to adhere to your CSR principles?
- Do you have a Social Media Policy? If yes, please attach document

In addition to the questions above, the suppliers are asked to provide relevant policies, whether they are certified by renowned certification organisations like ISO, FPAL, etc. If they are not, additional information is requested.

Code of conduct

SeaBird Exploration has developed its own Code of Conduct, which is available on our website. Our Purchase Orders (PO) refer to this published Code of Conduct and by accepting our orders, our suppliers also accept our Code of Conduct.

Audits

We have a system in place to conduct regular audits of our suppliers. In 2022, four companies were audited, three manning agencies and one agent. There were no findings related to the purpose of the Transparency Act.

Data from 2022

In 2022, we identified 200 unique suppliers from 24 different countries. The different countries are listed below along with their scores in different human rights indexes. The amount of money spent in the different countries are also listed, and the number of suppliers in the different countries.

| Country | Freedom House ¹ | HDI ² | CPI ³ | Unified value (USD) | Number of companies |
|-----------------|----------------------------|------------------|------------------|---------------------|---------------------|
| Australia | 95 | 0.951 | 75 | 19 233 | 1 |
| Austria | 93 | 0.916 | 71 | 5 808 | 1 |
| Bahamas | | 0.812 | 64 | 39 496 | 2 |
| Bulgaria | 79 | 0.795 | 43 | 24 528 | 1 |
| Cyprus | 92 | 0.896 | 52 | 202 025 | 15 |
| Czech Republic | 92 | 0.889 | 56 | 10 743 | 1 |
| Denmark | 97 | 0.948 | 90 | 561 691 | 2 |
| Egypt | 18 | 0.731 | 30 | 428 942 | 6 |
| Finland | 100 | 0.940 | 87 | 370 220 | 1 |
| France | 89 | 0.903 | 72 | 179 699 | 3 |
| Germany | 94 | 0.942 | 79 | 165 668 | 1 |
| Gibraltar | | | | 28 060 | 1 |
| Greece | 86 | 0.887 | 52 | 435 | 1 |
| India | 66 | 0.633 | 40 | 1 308 208 | 8 |
| Indonesia | 58 | 0.705 | 34 | 2 758 | 2 |
| Lithuania | 89 | 0.875 | 62 | 3 580 | 1 |
| Malta | 89 | 0.918 | 51 | 664 | 1 |
| The Netherlands | 97 | 0.941 | 80 | 72 060 | 5 |
| Norway | 100 | 0.961 | 84 | 4 774 731 | 71 |
| Poland | 81 | 0.876 | 55 | 104 963 | 9 |
| Singapore | 47 | 0.939 | 83 | 1 875 909 | 18 |
| Spain | 90 | 0.905 | 60 | 50 098 | 2 |
| Sri Lanka | 54 | 0.782 | 36 | 94 991 | 6 |
| UAE | 18 | 0.911 | 67 | 40 460 | 3 |
| UK | 93 | 0.929 | 73 | 718 030 | 13 |
| USA | 83 | 0.921 | 69 | 788 950 | 25 |

As our business is part of a highly technical industry, most our suppliers either delivers spare parts or technical services on board our vessels. These parts or services are very specialised and there are few to none alternatives, Regardless,

¹ <https://freedomhouse.org/countries/freedom-world/scores>

² <https://hdr.undp.org/data-center/human-development-index#/indicies/HDI>

³ <https://www.transparency.org/en/cpi/2022>

they are part of our screening process as outlined earlier. Of the feedback on our questionnaire, all of our suppliers have responded satisfactorily, and control both themselves and their own suppliers. So far, we have received feedback from 12 of our suppliers, and we do acknowledge that we were late in starting to send our questionnaire to our suppliers. Unfortunately, we do not receive feedback from all the suppliers, even after several reminders.

This is the first year, we report on the transparency act, and we started unfortunately quite late in 2022 sending out the questionnaire, implying that for example our activity in Egypt ended before this work started. Identifying Egypt as the country among our suppliers with the highest risk for human right violations, this should have been recognised earlier.

3.2 Challenges faced during implementation

The main challenge encountered has been to receive feedback on questionnaires in a timely manner. The nature of our operational can be hectic, and suppliers need to be reminded to return the questionnaire. Some of our suppliers are very specialised, and without a real competitor, and can therefore permit to omit feedback. However, as more and more companies are in the same situation, standardised questionnaires should be considered developed, as this can be a time-consuming exercise.

As SeaBird Exploration is a small company with few employees, the handling of input or actions to be taken to control our suppliers is quite challenging. Efforts are being made to involve a major part of the organisation in order to seek the need information from our suppliers.

3.3 Solutions developed to overcome challenges

In order to overcome the identified challenges, more involvement from the entire SeaBird Exploration organisation has been needed. This has had a positive effect, where the organisation has a deeper understanding of the necessity to control the suppliers.

3.4 Successes achieved in implementation

So far, it has been difficult to identify any successes in the implementation, both because we have difficulties in getting feedback from our suppliers, and also, because those we do receive feedback from, report that their policies follow the intention of the transparency act.

4. Benefits of transparency act to the company

4.1 Improved supply chain transparency

Transparency plays a crucial role in risk mitigation by providing a clear view of the supply chain. Businesses can proactively identify vulnerabilities like single-source dependencies, or geopolitical risks. Armed with this information, companies develop contingency plans, diversify suppliers, and build resilience against disruptions such as natural disasters, trade disputes, or supplier bankruptcies.

Ethical and sustainable practices are promoted through supply chain transparency. Compliance with labour standards, environmental regulations, and responsible sourcing principles can be verified. Understanding the conditions under which products are manufactured empowers organisations to ensure fair wages, safe working conditions, and environmentally responsible operations. Furthermore, transparency facilitates the identification of potential human rights abuses, promoting social responsibility throughout the supply chain.

Improved transparency leads to increased efficiency in supply chain operations. Insight into production cycles, transportation routes, and inventory levels enables better planning and optimisation. Identifying areas of inefficiency, such as excess inventory or underutilised transportation capacity, allows for corrective actions. Moreover, closer collaboration with suppliers fosters improved communication and coordination, streamlining processes and reducing costs.

Transparent supply chains simplify regulatory compliance. Accurate and auditable records regarding product origins, certifications, and adherence to safety and quality standards aid in meeting stringent regulations. Proactive identification and resolution of non-compliance issues minimise the risk of fines or penalties while demonstrating commitment to regulatory frameworks.

In summary, improved supply chain transparency empowers businesses to make informed decisions, mitigate risks, improve operational efficiency, promote sustainability, and build trust with clients. By effectively addressing challenges and adapting to market demands, organisations gain a competitive advantage in today's globalised and socially conscious marketplace.

4.2 Increased efficiency in operations

Improved efficiency in operations encompasses various aspects that contribute to streamlining processes, optimising resource utilisation, and eliminating wasteful activities within the supply chain. Supply chain transparency plays a vital role in achieving these efficiencies.

Transparency fosters closer collaboration and communication with suppliers. By sharing information organisations can work closely with suppliers to synchronise activities, improve lead times, and reduce delays. Strong supplier relationships facilitate faster response times, ensure reliable supply, and enable efficient problem-solving when issues arise.

Through supply chain transparency, companies can identify and optimise processes. By visualising the flow of information, and cash across the supply chain, organisations can identify areas of inefficiency and implement process improvements. Streamlining processes reduces lead times, eliminates waste, minimises errors, and improves overall productivity.

Transparent supply chains provide visibility into transportation routes, modes, and costs. This information allows businesses to optimise transportation logistics, choose the most efficient routes, and consolidate shipments when possible. Efficient transportation planning minimises transit times, reduces fuel consumption, optimises capacity utilisation, and lowers transportation costs.

Transparency is often achieved through the integration of digital technologies, such as supply chain management systems, real-time tracking tools, and data analytics platforms. These technologies enable seamless information sharing, automation of manual tasks, and data-driven insights. By leveraging technology, organisations can streamline operations, reduce errors, and improve overall efficiency.

By focusing on these aspects and leveraging the benefits of supply chain transparency, businesses can optimise their operations, reduce costs, improve customer satisfaction, and gain a competitive edge in the market.

The benefits of improved supply chain transparency align with the objectives of transparency acts and regulations. Transparency acts are legislative measures implemented by governments to promote greater visibility and accountability within supply chains. These acts aim to ensure that businesses operate ethically, maintain responsible practices, and provide accurate information to clients.

Transparency acts often emphasise the importance of ethical and sustainable practices within supply chains. Improved transparency enables businesses to verify compliance with labor standards, environmental regulations, and

responsible sourcing principles. By providing visibility into supply chain operations, these acts promote the adoption of fair wages, safe working conditions, and environmentally responsible practices.

Transparency acts aim to empower clients by providing them with accurate information about the products they purchase. Supply chain transparency enables businesses to trace and communicate product origins, manufacturing processes, and other relevant details to clients. This information builds trust, enhances client confidence, and enables them to make informed choices based on their values.

Transparency acts encourage businesses to identify and mitigate risks within their supply chains. Improved transparency provides companies with a clear view of potential vulnerabilities and disruptions, such as single-source dependencies or environmental risks. By proactively addressing these risks, businesses can enhance their resilience, reduce the impact of disruptions, and ensure the continuity of their operations.

These acts often require businesses to comply with specific reporting and disclosure requirements. Improved supply chain transparency facilitates compliance by providing accurate and auditable records of activities, certifications, and compliance with safety and quality standards. By promoting transparency, these acts ensure that businesses adhere to regulatory frameworks and maintain accountability.

Supply chain transparency contributes to operational efficiency, which is aligned with the goals of transparency acts. By providing visibility into inventory levels, demand patterns, and production schedules, transparency enables businesses to optimise processes, reduce waste, and streamline operations. These efficiencies help companies comply with regulations, minimise costs, and enhance overall performance.

In summary, the benefits of supply chain transparency closely align with the goals and objectives of transparency acts. By promoting ethical practices, empowering clients, mitigating risks, ensuring compliance, and optimising processes, supply chain transparency contributes to the overarching objectives of transparency legislation.

4.3 Enhanced client trust

Transparency acts play a significant role in enhancing client trust and confidence in companies. When businesses prioritise supply chain transparency and comply with relevant legislation, it fosters trust among clients. Here's how transparency acts contribute to building enhanced client trust:

Firstly, transparency acts require businesses to provide clients with access to information about the products they purchase. This includes details about sourcing, manufacturing processes, and relevant certifications or standards followed. By providing this information, businesses empower clients to make informed decisions based on their values and preferences. Access to reliable and accurate information builds confidence in the products they buy and the companies they support.

Clients increasingly expect businesses to operate with social responsibility and ethical practices. Transparency acts encourage companies to disclose their efforts in these areas, such as fair labor practices, responsible sourcing, and environmental sustainability. When clients see that a company is transparent about its commitment to these values, it establishes trust and reassurance that the business is operating ethically and responsibly.

Transparency acts hold companies accountable for their actions and require them to disclose relevant information about their supply chains. When businesses comply with these regulations, they demonstrate their commitment to transparency and accountability. This commitment reassures clients that the company is reliable and trustworthy, as it is willing to be transparent and open about its operations.

Transparent supply chains create a foundation for building long-term relationships with clients. When businesses openly share information about their supply chain practices and demonstrate responsible behavior, it establishes a

sense of trust and loyalty among clients. Transparent companies are more likely to attract and retain customers who value transparency and socially responsible practices, leading to stronger and more sustainable customer relationships.

In summary, transparency acts contribute to enhanced client trust by ensuring businesses provide accurate information, demonstrate social responsibility, and establish accountability. By embracing transparency and meeting the requirements of these acts, companies can build a strong foundation of trust with clients, leading to increased customer loyalty, and a competitive advantage in the market.

4.4 Potential for increased sales and revenue

Improved supply chain transparency, facilitated by transparency acts, has the potential to positively impact sales and revenue for businesses. Here's how increased transparency can contribute to sales growth and revenue generation:

Firstly, many clients today actively seek out companies that demonstrate transparency and ethical practices. By being transparent about their supply chains, businesses can attract a growing segment of clients who prioritise transparency, sustainability, and social responsibility. This client preference for transparent companies can lead to increased sales as clients choose products from companies they trust and perceive as responsible.

Supply chain transparency can provide a competitive advantage in the market. When businesses are transparent about their sourcing, manufacturing processes, and adherence to regulations, it differentiates them from competitors. Transparent companies are often seen as more trustworthy, credible, and socially responsible, which can give them an edge in customer acquisition and retention. This competitive advantage can translate into increased market share, higher sales, and revenue growth.

Transparency acts reflect the evolving expectations of clients. As these regulations become more prevalent and companies comply with them, clients come to expect transparency as a standard practice. By meeting these expectations and providing the transparency clients desire, businesses can attract and retain customers who value such practices. Meeting client expectations leads to customer satisfaction, positive word-of-mouth recommendations, and increased sales.

When companies are transparent about their supply chains, they demonstrate a commitment to integrity, ethical practices, and client well-being. This transparency fosters a positive reputation, which can attract new customers and reinforce loyalty among existing customers. A strong reputation positively influences purchase decisions, resulting in increased sales and revenue.

Transparency acts often extend beyond national borders, with global regulations focusing on supply chain transparency. By embracing transparency and complying with these regulations, businesses can expand their reach into new markets. Transparent supply chains can help overcome barriers to entry and gain the trust of clients in new regions, driving sales growth and revenue expansion.

Supply chain transparency can also have an impact on investor confidence. Investors increasingly consider environmental, social, and governance (ESG) factors when making investment decisions. Companies with transparent supply chains are perceived as lower-risk and more attractive investments. Enhanced investor confidence can result in increased funding, capital, and resources that contribute to business growth and revenue generation.

It is important to note that the actual impact on sales and revenue will depend on various factors such as industry, target market, competitive landscape, and the effectiveness of transparency initiatives. However, by embracing transparency and meeting the expectations of clients and stakeholders, businesses can position themselves for increased sales and revenue opportunities.

5. Conclusion

5.1 Recap of key points

In conclusion, we do have a system in place to identify suppliers and risk assess our potential exposure to companies violating human rights. Our safety management system provides also the opportunity for logging, follow-up and addressing any breach of our code of conduct. Further and more diligent work is ongoing in order to secure feedback from our suppliers, and through this process, employees have a higher awareness of the objective of the Transparency Act.

5.2 Future implications of the Transparency Act for the company

Going forward, it is believed that the focus from Norwegian companies, will make it easier to have questionnaire returned from suppliers, if they are more used to receive them.

5.3 Recommendations for further improvement

At lot of work is put into filling out forms from companies, where we are the suppliers, and chasing up replies from our suppliers, it would therefore be good if a standardised form could be developed.

ⁱ Company includes the company and any of the company's (or its affiliates) officers, directors, shareholders, owners or employees.