



# **Act on Business Transparency and Work with Fundamental Human Rights and Decent Working Conditions**

2025



## 1. Introduction and Background

The Transparency Act (“Act relating to enterprises’ transparency and work on fundamental human rights and decent working conditions”) entered into force on July 1, 2022. It has two overarching objectives:

- To promote respect for fundamental human rights and decent working conditions in the production of goods and the provision of services; and
- To ensure public access to information about how enterprises handle adverse impacts they cause, contribute to, or are directly associated with in their value chains.

As Bergen Engines AS is subject to this law, the company is required to:

1. Conduct due diligence assessments of risks related to human rights and working conditions within its own operations and supplier chains;
2. Publish an annual statement outlining these assessments; and
3. Respond to written requests for information from anyone.

According to Section 5 of the law, the annual statement must cover the following minimum requirements:

- Operations and governance – a description of the company’s structure, business areas, policies, and procedures for addressing actual and potential adverse impacts;
- Findings – information about identified actual adverse impacts and significant risks;
- Actions and results – measures implemented or planned to cease, prevent, or mitigate impacts, as well as achieved or anticipated outcomes.

Furthermore, the statement must be approved and signed according to Section 3-5 of the Accounting Act before publication.

In 2025, the company had an average of 659 full-time employees, 37 temporary employees at year end, revenue of NOK 3,797 million in revenue, and an operating profit of NOK 917 million.

## 1.2 Reporting Period

This statement covers only Bergen Engines AS, encompassing the fiscal year January 1 – December 31, 2025. The statement will be published on [www.bergenengines.com/apenhetsloven](http://www.bergenengines.com/apenhetsloven) no later than June 30, 2026, and will remain available for at least three years.

## 1.3 About Bergen Engines

Headquartered at Hordvikneset 125 near Bergen, Bergen Engines AS<sup>1</sup> designs, manufactures, and maintains large medium-speed piston engines and generators for both land-based power generation and marine propulsion.

Since December 31, 2021, Bergen Engines has been central to Langley Holdings plc’s Power Solutions Division, alongside Marelli Motori and Piller Power Systems.

Bergen Engines AS, including its international subsidiaries, supplies new products and a wide range of aftermarket services to customers worldwide – either directly or through established sales and service partners.

## 2. Commitment to Responsible Business

Bergen Engines AS is committed to respecting internationally recognized standards and conventions for human rights and decent working conditions.

The company supports:

- UN International Bill of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights (UNGPR)
- OECD Guidelines for Multinational Enterprises

### 2.1 Board and Management Responsibility

The board of Bergen Engines AS holds overall responsibility for compliance with the Transparency Act. Through board resolutions, responsibility for implementation and compliance is delegated to the CEO, including:

- Overall responsibility for Transparency Act compliance
- Responsibility for establishing and maintaining procedures for information requests the board, in cooperation with management, regularly updates relevant guidelines and procedures and monitors progress in the company’s efforts regarding human rights and decent working conditions.

<sup>1</sup> In addition to Bergen Engines AS, the Group includes branch offices in Denmark, India, Italy, Spain, the Netherlands, the United Kingdom, Mexico, the USA, and Bangladesh.

**2.2 Policies and Guidelines**

Bergen Engines has established a framework for responsible business applicable to employees, suppliers, and partners, including:

- Ethical Guidelines
- Global policy Anti discrimination
- Global Supplier Code of Conduct
- Global Code of Conduct
- Global policy Whistleblowing
- Health, Safety, and Environment (HSE) Policy
- Diversity and Inclusion Policy
- ISO 9001, 14001, and 45001 certifications These documents are published on the company’s website and are contractually binding in the supply chain.

**2.3 Organization and Responsibilities**

- The Board provides overall oversight and approves guidelines and plans.
- The CEO holds operational responsibility.
- HR is responsible for ensuring that people-related policies and practices are implemented, supporting managers, promoting employee wellbeing and competence development, and contributing to compliance with labor rights and ethical employment standards.
- HSE and compliance functions identify, assess, and follow up on risks.
- Business units and safety representatives monitor local working conditions and participate in joint committees.
- Suppliers commit through self-declarations, audits, and improvement plans.

**2.4 Training and Internal Awareness**

Bergen Engines actively promotes awareness of the Transparency Act and related company policies throughout the organization. Relevant policies, procedures, and guidance materials are available on the company intranet, and employees are regularly informed about reporting mechanisms, ethical expectations, and available support tools.

The company maintains whistleblowing procedures in accordance with the Working Environment Act and has established processes for reporting, investigating, and following up on concerns. HR plays a key role in implementing people-related policies, supporting managers, promoting employee wellbeing and competence development, and ensuring compliance with labor rights and employment standards.

Bergen Engines has six collective bargaining agreements, designated safety representatives, and established procedures for handling deviations, workplace concerns, and HSE follow-up. Employee representatives participate in relevant consultation and cooperation forums. The Board reviews policies, risk assessments, and progress related to the Transparency Act and responsible business conduct at least annually.

**2.5 Information Requests**

Requests for information under section 6 of the Transparency Act should be sent to: [apenhetsloven@bergenengines.com](mailto:apenhetsloven@bergenengines.com)  
 Receipt of the request will be acknowledged within five working days, and a response provided within three weeks.

**3. Due Diligence Assessments**

Our approach to due diligence assessments follows the OECD’s recommended six-step model and is based on the UN Guiding Principles on Business and Human Rights (UNGPR). This dynamic and risk-based process continuously adapts according to the nature, size, position in the value chain, and available resources of our operations.

The work includes mapping, risk assessment, actions, monitoring, communication, and improvement. The purpose is to identify and manage risks of negative impacts on fundamental human rights and decent working conditions related to our own operations.

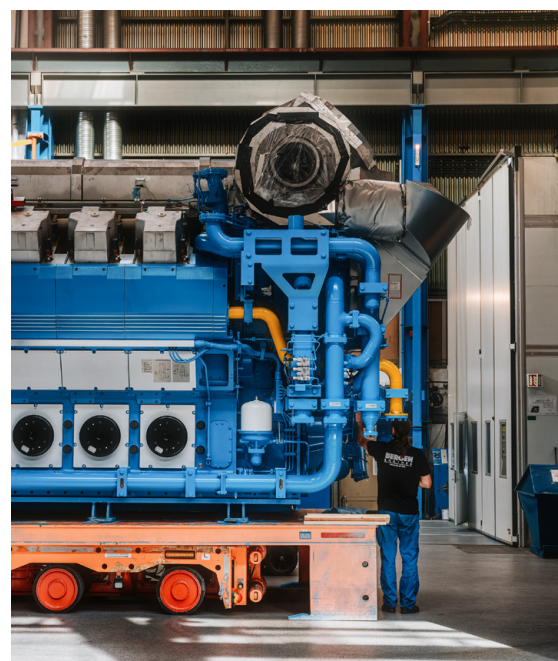
**3.1 Risk Assessment in Own Operations**

Bergen Engines AS conducts systematic due diligence assessments within its own operations to identify risk areas, including physical and psychosocial working conditions, freedom of association, whistleblowing, equality, and forms of employment. This is conducted in close collaboration with safety representatives, union representatives, HR and HSE managers.

The assessments specifically target areas historically known to carry higher risks within industrial production and technical service sectors, including HSE, working hours, wages, discrimination, temporary employment, and whistleblowing procedures.

Our methodology includes:

- Internal HSE audits, management reviews, and periodic inspections, including unannounced workplace observations where relevant.
- Ongoing collaboration and consultation with safety representatives, union representatives, and employee representatives through established cooperation forums.
- Systematic reporting, investigation, and follow-up of HSE deviations, incidents, near misses, and first-aid cases to identify root causes and preventive measures.
- Employee surveys, engagement assessments, and follow-up discussions to identify improvement areas and monitor employee wellbeing.
- Regular assessments of physical, organizational, and psychosocial working conditions, including actions to promote a safe, healthy, and inclusive work environment.
- HR monitoring of workforce-related indicators, competence development, employee relations, and compliance with labor standards and internal policies.



Our 2025 findings, measures and results or expected effect is as follows:

Findings	Measures	Result (R) or Expected Effect (EE)
<b>1. Hand injuries in 2024.</b>	A planned hand injury prevention campaign was not fully implemented as intended in 2025. However, awareness activities were carried out through HSE meetings, Working Environment Committee (AMU) meetings and posters displayed in production areas. In addition, a review of hand protection and glove use has been initiated to promote appropriate hand protection.	EE: Increased awareness of hand injury risks among employees. The review of hand protection is expected to improve the use of appropriate protective equipment and contribute to reducing the risk of hand injuries.
<b>2. Due to changed global security in our market areas in Europe, Middle East, Africa and Middle / South America the security risk is increasing.</b>	Internal travel security audits were conducted.	R: Findings were found and mitigated.
<b>3. Continuous focus on HSE work.</b>	Unannounced HSE inspections and internal HSE audits are conducted regularly together with employee representatives. Findings are documented, communicated internally where relevant, and followed up through corrective actions.	R: Emphasis on HSE improvements continues. Findings are documented in reports and communicated to all employees through intranet (anonymized due to GDPR). In 2023, 10 un-announced HSE inspections were carried out. In 2024, 5 un-announced inspections were carried out, and 12 internal HSE audits were conducted. In 2025, 1 un-announced inspection was carried out, while internal HSE audits remained stable at 12.
<b>4. Safety at our workplace</b>	Injuries are measured within the company using the Total Reportable Injury rate (TRIR). We are paying close attention to Near Misses also, as some of these are regarded High Potential (HiPo). All TRI's and FAI's have been reported to Norwegian Authorities regardless of severity to ensure correct support from authorities (NAV) and insurance company in case of late injury.	R: Reportable injuries: In 2023, the Total Reportable Injury Rate was 1.45, with 11 total reportable injuries, of which 9 were lost time injuries. In 2024, the rate was 1.62, with 10 total reportable injuries and 9 lost time injuries. In 2025, the rate was 1.16, with 10 total reportable injuries, of which 6 were lost time injuries. First aid injuries: In 2023, there were 15 first aid injuries. In 2024, this was 21, and in 2025, there were 17 first aid injuries.
<b>5. Lower representation of women in management and in parts of the workforce.</b>	Recruiting more women to increase the proportion of women.	R: Women overall: In 2023, women made up 14.5% of the total workforce, with 88 women. In 2024, the share increased to 15.4%, with 98 women. In 2025, the share returned to 14.5%, while the number of women increased to 109. Apprentices: In 2023, women made up 31.0% of apprentices, with 11 women out of 35 apprentices. In 2024, this increased to 37.5%, with 15 women out of 40 apprentices. In 2025, the share was 37.0%, with 17 women out of 46 apprentices.
<b>6. General well-being and sickness absence</b>	Workplace environment survey with departmental targets and action plans, available occupational health services 4 days a week, and mandatory HSE training.	R: In 2023, the absence rate due to sick leave was 8.8%. In 2024, it decreased to 7.4%, and in 2025 it decreased further to 7.2%, showing a steady improvement over the three-year period.

*Based on our assessments, our clear evaluation is that Bergen Engines AS neither causes nor contributes to, nor is directly linked to actual or potential negative impacts on fundamental human rights or decent working conditions within its own operations. The risk is generally assessed as low, both in terms of likelihood and severity.*

**3.1.1 Production Scale-Up and Preventive Measures**

Bergen Engines AS is undergoing a significant production ramp-up to meet sustained growth in demand, resulting in a strong order backlog and delivery pipeline. Demand is particularly high for the B36 engine platform, increasing both capacity utilization and operational complexity.

In connection with the production scale-up, the company has assessed how increased activity levels and workforce growth may affect health and safety, working conditions, and the overall working environment.

To support a safe scale-up, the company continues to strengthen its focus on onboarding, training, competence development, and employee follow-up. Relevant procedures, work instructions, and training activities are reviewed

and developed in line with operational growth to ensure that employees receive the information, guidance, and support necessary to perform their work safely and in accordance with company expectations. Particular emphasis is placed on clear communication, equal access to information, and maintaining a safe, inclusive, and respectful working environment for all employees.

As part of this work, the company maintains a particular focus on lifting operations, which are considered a key health and safety risk area. Risk assessments, procedures, and operational controls are regularly reviewed to support safe and consistent work practices as activity levels increase.

**3.2 Due Diligence Assessments in the Supply Chain**

Bergen Engines AS has implemented a systematic and risk-based methodology for assessing its supplier base in accordance with the Norwegian Transparency Act and the OECD Due Diligence Guidance for Responsible Business Conduct. The assessment process consists of several sequential steps:

**a. Data Foundation: Spend-based Supplier Extraction**

Our assessment is based on ranked procurement data from 2025. Supplier spend is used as an initial prioritization criterion, reflecting both our commercial relationship and our potential leverage to influence suppliers where risks are identified.

**b. Country Risk: Index-based Evaluation**

Suppliers' registered countries of operation are assessed against a range of internationally recognised indices relating to human rights, labour rights, governance, corruption and rule of law. These indicators are used as an initial screening tool to identify suppliers with elevated inherent risk. Country-level indicators do not alone determine risk but provide the basis for further supplier-specific assessment where appropriate.

**c. Questionnaire as a Follow-up Tool**

In 2024, Bergen Engines developed supplier questionnaires for obtaining additional information from suppliers identified through the risk screening process. The questionnaires are adapted to the specific risk areas indicated by the country assessment and are used to support dialogue with suppliers regarding human rights, working conditions, governance structures and other relevant topics.

**d. Industry and Sector Risk Assessment**

For suppliers operating in sectors known to have elevated risks related to health, safety, labour rights or supply-chain transparency, additional assessments may be conducted regardless of country risk level. These assessments are supported by questionnaires focusing on HSE performance, management systems and due diligence practices within the supplier's own supply chain.

**e. Desktop Audit of Higher-risk Suppliers**

Where considered necessary, suppliers identified through the country and sector risk assessment may be subject to a desktop review of publicly available information, including company information, annual reports, media coverage, certifications and other relevant sources.

**f. Audits and Requirements During Physical Supplier Follow-up**

As part of supplier visits and supplier audits, Bergen Engines has implemented evaluation criteria related to compliance with the Norwegian Transparency Act and responsible business conduct expectations.

**3.2.1 Changes in the Due Diligence Assessment**

In last year's statement, we outlined an intention to introduce an economic assessment of selected Norwegian suppliers to evaluate whether financial circumstances could increase the risk of adverse impacts on workers' rights and working conditions.

Following further evaluation, this assessment was not implemented as a permanent element of our due diligence methodology. The exercise proved resource-intensive and did not identify risk factors beyond those already captured through existing assessments.

We have therefore concluded that our resources are more effectively directed towards country, sector and supplier-specific risk assessments where the probability of identifying material risk is considered higher.

**3.3 Assessment of Supplier Base and Follow-up Measures**

As part of the methodology described above, Bergen Engines assessed its supplier base in 2025, consisting of 751 suppliers, of which 503 are registered in Norway.

Continent	Number of Countries	Number of Suppliers	Subsidiaries / Own Divisions
Africa	2	4	1
Asia	8	11	4
Europe	21	211	9
America	4	22	2
Oceania	0	0	0
Norway	1	503	1
<b>Total</b>	<b>36</b>	<b>751</b>	<b>17</b>

The relatively limited number of suppliers identified for further review reflects the composition of our supplier base, where a significant proportion of suppliers operate in Norway and other countries generally characterised by strong legal frameworks, established labour protections and comparatively low inherent human rights risk.

Based on the due diligence assessments conducted in accordance with the Norwegian Transparency Act and the OECD Guidelines for Multinational Enterprises, eight suppliers were identified as having elevated inherent risk and were therefore considered for further assessment and follow-up. Branch offices and sister companies, which are considered low risk based on the assessment methodology, have not been included in this group.

It is important to note that the identified risk relates to inherent risk indicators and does not in itself indicate that adverse impacts have occurred or that the suppliers have violated human rights or labour standards. Rather, these suppliers were flagged for closer review due to factors related to country risk, sector risk or other relevant indicators.

Two of these suppliers received questionnaires following last year's assessment. The questionnaires addressed topics including human rights governance, working conditions, management systems and production-related risks.

One supplier provided satisfactory responses and supporting information. Based on the information received, Bergen Engines no longer considers the supplier to represent an elevated risk requiring additional follow-up at this time.

<sup>2</sup> Global Rights Index, Global Slavery Index, Children's Rights in the Workplace Index, Corruption Perception Index, Human Development Index, Gender Inequality Index, Environmental Performance Index

The second supplier did not respond to the questionnaire. The supplier was contacted again in 2025 and requested to provide the relevant information. As no response has yet been received, Bergen Engines will conduct further follow-up through written communication and, where appropriate, through the relevant supplier owner and procurement channels. Supplier cooperation forms an important part of our due diligence process, and continued failure to respond to reasonable information requests may be considered as part of future supplier evaluations and relationship management.

For the remaining six suppliers identified through the risk screening process, Bergen Engines has, based on the principle of proportionality and an assessment of severity, likelihood, business relationship, available information and leverage, concluded that no specific additional measures are currently required. This conclusion is based on the information available at the time of assessment and will be reconsidered should new information emerge.

One supplier that was not subject to additional measures following last year's assessment was reviewed under the same principles. All such decisions remain subject to periodic reassessment as part of the ongoing due diligence process and will be reviewed further during 2026.

Following last year's assessment, questionnaires were also distributed to three suppliers categorised as medium risk due to their operation within sectors considered to have elevated HSE-related risk exposure. Two suppliers provided responses, while one supplier has not yet responded and will be subject to additional follow-up. Based on the 2025 assessment and application of the proportionality principle, no additional suppliers from medium- or low-risk countries operating within the same sector categories have been identified for questionnaire-based follow-up at this time.

#### 3.4 Lessons Learned and Further Improvements to Our Follow-up Process

The work completed during 2025 demonstrates that Bergen Engines has strengthened its approach to supplier due diligence. At the same time, the assessment has identified areas where our follow-up processes can be improved further.

While the majority of planned assessments and follow-up activities have been completed, certain supplier responses were not followed up as systematically or as promptly as intended. This demonstrates a need for stronger escalation routines, clearer ownership of follow-up activities and more consistent documentation of decisions where additional measures are deemed unnecessary.

Although these shortcomings relate primarily to process implementation rather than identified adverse impacts, Bergen Engines recognises the importance of ensuring that due diligence activities are completed and documented in a consistent and transparent manner. We therefore view the findings from this year's assessment as an important basis for continued improvement.

Compared with previous years, Bergen Engines has established a more structured and documented basis for identifying suppliers requiring closer review. This includes clearer use of risk indicators, more systematic application of the proportionality principle and improved oversight of supplier responses and follow-up activities.

Going forward, we will continue to strengthen our due diligence process by clarifying responsibilities, improving escalation procedures and ensuring that decisions to conclude, postpone or limit follow-up activities are appropriately documented. These measures will support a more consistent, transparent and effective approach to supplier due diligence as part of our ongoing work under the Norwegian Transparency Act.



#### 3.5 Supplier Code of Conduct

Bergen Engines AS maintains a Supplier Code of Conduct that outlines our expectations regarding human rights, working conditions, health and safety, anti-corruption and environmental responsibility. The Code supports our supplier follow-up process and forms part of our overall framework for responsible business conduct and compliance with the Norwegian Transparency Act.

#### 4. Management of Actual and Potential Adverse Impacts

Bergen Engines AS has established procedures for addressing actual and potential adverse impacts identified through its due diligence process.

Where risks are identified, measures are assessed based on severity, likelihood and our ability to influence the supplier. Consistent with OECD guidance, we seek to use our leverage to promote improvement and risk mitigation where appropriate.

Based on the assessments conducted in 2025, Bergen Engines AS has not identified any confirmed adverse impacts requiring remediation measures. Our follow-up activities have therefore primarily focused on risk prevention, supplier dialogue and continuous improvement.

#### 5. Approval and Signature

This statement was reviewed and approved by the Board of Directors of Bergen Engines AS on 26.06.2026, in accordance with Section 3-5 of the Accounting Act.

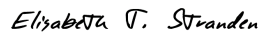
**Bergen 26.06.2026**



Hordvikneset | June 26, 2026


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Chairman

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