



Statement of due diligence assessments

**GC Rieber Shipping Holding AS
2023**

1. Introduction

The Transparency Act obliges companies to conduct due diligence assessments to ensure that they respect internationally recognized human rights in their operations. These assessments follow the standards of the OECD's guideline for multinational companies and the UN's guiding principles for business and human rights. This statement describes how GC Rieber Shipping has established its responsibility, identified, and evaluated risks, and taken action to address actual and potential negative impacts on human rights and working conditions related to GC Rieber Shipping's business activities.

The Transparency Act only applies to the definition of "larger companies" by law. GC Rieber Shipping does not fall under this category and is not legally required to publish this statement of due diligence. However, the Company chooses to do so voluntarily.

2. About GC Rieber Shipping

As a ship-owner and project house, GC Rieber Shipping develops and invests in maritime projects that are profitable and sustainable. The Group provides customized, innovative, and sustainable maritime solutions for customers worldwide. Leveraging the Group's extensive expertise in marine architecture and project management, GC Rieber Shipping has a track record of delivering high-quality vessels for challenging projects. GC Rieber Shipping Holding AS and its subsidiaries are part of GC Rieber Group, and are based in Bergen, Norway. As of the end of 2023, the Group had ten employees.

GC Rieber Shipping has been working on a newbuild project for offshore wind in 2023, which involves two Windkeeper vessels that will be delivered in 2025. The Windkeepers are based on GC Rieber Shipping's own design and are optimized for effective operations and maintenance of offshore wind farms. The vessels are under construction in Turkey, where GC Rieber Shipping has a dedicated team to monitor the building process. The Group ensures that the building process is conducted with high standards of quality, safety, and social responsibility. Windkeeper also obtained ISO 9001 certification for its quality system in 2023, demonstrating its ability to deliver high-quality services, manage risks, and meet customer expectations.

After divesting its subsea segment vessels in recent years, GC Rieber Shipping only has the icebreaker vessel Polar Circle in its fleet as of 2023. The Group acquired the remaining 50% stake in Polar Circle from its joint venture partners in early 2023, becoming its sole owner. GC Rieber Shipping has since then sold Polar Circle to new owners in March 2024.

For further information about GC Rieber Shipping, see www.gcieber-shipping.com, and the annual- and sustainability report for 2023.

3. Anchoring accountability in GC Rieber Shipping

GC Rieber Shipping upholds and complies with all international human rights standards. This covers, among others, the UN Universal Declaration of Human Rights, the UN Convention on Economic, Social and Cultural Rights, the UN Convention on Civil and Political Rights, the ILO Declaration on Fundamental Principles and Rights at Work and other applicable norms within international humanitarian law. The Group also seeks to increase its accountability by enhancing its due diligence assessment procedure. The procedure defines the method and process, as well as the roles and responsibilities involved. The procedure aims to ensure that all the steps in the due diligence assessment are completed.

GC Rieber Shipping expects its suppliers, sub-suppliers, and business partners to comply with and uphold national and international laws, standards and recognized conventions on human rights and decent working conditions. GC Rieber Shipping adheres to the code of conduct set by GC Rieber group and has a long-standing code of conduct for its suppliers. The Code of Conduct sets clear expectations that the suppliers, sub-suppliers, and business partners must fulfill all relevant human and/or working rights. Through responsible procurement and supply chain management, GC Rieber Shipping is committed to ensuring that human and workers' rights are respected in the supply chain.

4. Due diligence assessments in GC Rieber Shipping

GC Rieber Shipping has performed a thorough risk analysis of its supply chain and other relevant risk factors that may have an impact on human and workers' rights. The analysis involved collecting data from interviews, questionnaires, document reviews, procedure reviews and objective sources of country and industry risks. Based on the OECD guidelines, GC Rieber Shipping has chosen to focus on the areas of assumed high risk. The selection is done based on the level of severity, scope, and likelihood of potential negative impacts or harms. The Group have used its own risk assessment tool to map out its supply chain. This includes assessment and documentation of both quantitative and qualitative risk factors and is used for further follow-up with existing and new suppliers. The risk tool records the assessment which is based on the following factors:

- Country of operation of supplier/ sub-supplier
- Product/ Material
- Supplier / Sub-supplier

The sources of risk scoring are among MVO Risk Checker, Human Rights Watch, ILO, Country Reports on Human Rights Practices – United States Department of State, ITUC Global Rights Index, Bureau of International Labor affairs and DFØ's "Høyrisikoliste". These sources are public and accessible to all and are updated annually or biannually.

5. Result of GC Rieber Shipping's risk assessment

Risk Assessment

GC Rieber Shipping is currently building two vessels in Turkey, where its other operations are minimal. The Group has conducted a risk assessment and has not identified any negative impacts related to or arising from its activities. However, given the high-risk level in the country and the industry, the Group still considers that there is a significant possibility of adverse outcomes.

The risk assessment mainly focused on the shipyard and its subcontractors. Some of the potential risk factors in the shipyard industry are:

- Lack of adequate HSE measures, such as risks related to insufficient protective equipment, falling objects, chemical injuries, working in heights, hot work, fire, and explosion hazards etc.
- Use of materials and equipment in the building process that may have been produced under poor or unhealthy working conditions.
- Issues regarding temporary workers, migrant workers, and informal employment.
- Discrimination of certain groups or individuals.
- Deficient waste management practices, such as risks related to inadequate infrastructure for handling waste, hazardous waste and pollution of water, air, and soil.
- Corruption.

Mitigation Actions

GC Rieber Shipping has implemented and planned actions to avoid and minimize the negative effects of the due diligence process on the shipyard industry or its stakeholders. These actions include:

- Pre-qualifying new suppliers and their sub-suppliers based on their standards of quality, environment, work environment, human rights, and labor conditions.
- Perform audits and inspections of suppliers and potential sub-suppliers, to ensure they meet the requirements.
- Encouraging a strong HSE culture and adherence to health, environmental and safety measures.
- Keeping regular communication and collaboration with supplier and potential sub-supplier, to ensure best practices and close dialogue.
- Requirement of main suppliers to agree to GC Rieber's Code of Conduct
- Seeking continuous improvement

Measurement of these outcomes is still early to conclude its effect. GC Rieber Shipping expect that these actions will help to stop, reduce, and prevent any negative impact on human rights and decent work conditions. In 2023, the following mitigation actions were carried out:

- A third-party supplier audit of the shipyard on human rights and decent work conditions. No serious issues were found, but 3 minor issues and some areas for improvement. All issues were resolved and closed in 2023.
- An HSE campaign on hand and finger injuries was launched in 2023, which led to a positive trend of lower injury frequency.
- In the process of pre-qualifying the shipyard sub-suppliers, three were rejected as they were deemed too risky for human rights violations due to their country of origin.

A HSE campaign with a focus on falling object prevention is scheduled for 2024, in collaboration with the shipyard. As the newbuilds progresses into a pivotal stage in the building, GC Rieber Shipping is set to increase its presence at the shipyard. This will involve intensified oversight with more regular attendance from GC Rieber Shipping's project team members to closely track the construction developments.

6. Transparency and communication

GC Rieber Shipping strives to be transparent about the possible negative impacts of the Company's activities. As part of this commitment, the Company publishes an annual report on the website, in addition with this due diligence statement.

To contact GC Rieber Shipping regarding this due diligence work and statement,
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