



The Transparency Act

Greencarrier Liner Agency Norway AS

2026

1. INTRODUCTION

This report has been prepared in compliance with the legal obligations set forth in the Norwegian Transparency Act of June 2021. These requirements apply to Greencarrier Liner Agency Norway AS, a subsidiary of the global entity Greencarrier AB, hereafter referred to as 'Greencarrier Liner Agency.'

At Greencarrier Liner Agency, we are committed to upholding fundamental human rights and ensuring fair working conditions across all our operations and services. We are actively working to ensure full compliance with these legal obligations, while continuously improving the implementation of human rights due diligence within our organization.

This report outlines how Greencarrier Liner Agency manages human rights considerations within our operations and supply chain and details our future strategies in this area.

Greencarrier Liner Agency works proactively with its suppliers to ensure their adherence to human rights and labour standards that align with our internal policies. Prior to any collaboration, we conduct thorough assessments of potential suppliers, evaluating their commitment to ethical business practices, including human rights, labour conditions, and environmental sustainability.

We expect all Greencarrier representatives and business partners to adhere to the principles outlined in our Code of Conduct (CoC) or to apply equivalent standards within their operations. Our CoC is regularly updated, with the most recent revision completed in December 2024.

During 2026, Greencarrier Liner Agency continued its supplier due diligence process by distributing an updated supplier questionnaire aligned with the requirements of the Norwegian Transparency Act and the OECD Guidelines for Multinational Enterprises. The questionnaire forms part of the company's annual supplier assessment process and supports the identification and evaluation of potential human rights and labour-related risks within the supply chain.

Additionally, Greencarrier Liner Agency fully supports the key labour rights outlined in the conventions of the International Labour Organization (ILO). We are committed to the elimination of forced and compulsory labour and to eradicating discrimination in employment and occupation.

While we acknowledge the progress made, we recognize the importance of further aligning with the OECD Guidelines and proactively managing risks associated with potential human rights impacts, particularly within our supply chain.

This report covers the period from January 1, 2026, to December 31, 2026.

2. THE TRANSPARENCY ACT

The Transparency Act covers labour and human rights. The key provisions of the Transparency Act are reproduced below:

§ 4. Obligation to conduct due diligence assessments

Enterprises shall conduct due diligence assessments in accordance with the OECD Guidelines for Multinational Enterprises. For the purpose of this Act, due diligence assessments involve:

- a. Embed accountability in the enterprise's policies.
- b. Identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that the enterprise has caused or contributed to, or that are directly linked to the enterprise's business operations, products, or services through supply chains or business partners.
- c. Implement appropriate measures to prevent, mitigate, or remedy adverse impacts based on the enterprise's priorities and assessments under point b.
- d. Monitor the implementation and results of measures under point c.
- e. Engage in communication with affected stakeholders and rights holders regarding how adverse impacts have been addressed under points c and d.
- f. Ensure or cooperate in remediation and compensation where required.

Due diligence assessments should be conducted regularly and be proportionate to the size of the enterprise, the nature of its activities, the context in which the enterprise operates, and the severity and likelihood of adverse impacts on fundamental human rights and decent working conditions.

§ 5. Obligation to account for due diligence assessments

Enterprises shall disclose a report on the due diligence assessments according to § 4. The report shall include, at minimum:

- a. A general description of the enterprise's organization, scope of operations, policies, and procedures for addressing actual and potential adverse impacts on fundamental human rights and decent working conditions.
- b. Information on actual adverse impacts and significant risk of adverse impacts identified by the enterprise through its due diligence assessments.
- c. Information on measures implemented or planned by the enterprise to stop actual adverse impacts or mitigate significant risk of adverse impacts, and the results or expected outcomes of these measures.

The report shall be updated and disclosed annually and also in the event of significant changes in the enterprise's risk assessments.

Duty to provide information (The Transparency Act § 6 and § 7)

Any individual has the right to receive information, upon written request, about how the enterprise handles actual and potential adverse impacts concerning the implementation of the due diligence assessments. This includes both general information and information related to a specific product or service offered by the enterprise. The information shall be provided in writing and be comprehensive and understandable. The information shall be provided within a reasonable timeframe and no later than three weeks after the information request is received. If the scope of information requested makes it unreasonably burdensome to respond within three weeks, the information shall be provided within two months from the receipt of the request.

3. PROCEDURES FOR HANDLING THE TRANSPARENCY ACT

Greencarrier Liner Agency places strong emphasis on mitigating potential adverse impacts on workers in the value chain through supplier assessments and values-based dialogue with partners. This is particularly important given the nature of our business, which relies on a wide network of suppliers.

3.1 Risk Assessment

Based on experience and knowledge of suppliers, industries, geography, and specific risk considerations, the following risk and focus areas have been identified as the most significant:

- Gender equality, including equal pay for work of equal value.
- Non-discrimination on any grounds.
- The right to social security.
- Increasing the proportion of women in managerial positions.
- Good and safe working conditions, including health, environmental, and occupational safety standards.
- Reasonable limitations on working hours.

3.1.1 Risk Analysis

A structured risk analysis is conducted to identify the most significant risks within the defined focus areas.

The risk assessment is based on quantitative and qualitative evaluations. Key factors considered include:

- The number of individuals potentially affected.
- Internal risks and their implications for our organization.
- Societal risks and potential external consequences.
- Opportunities for improvement based on industry and national contexts.
- The feasibility of implementing necessary improvements.

The analysis follows a risk-based prioritization approach, meaning that the scope of assessment and follow-up actions are determined by the level of risk and the extent of our ability to influence outcomes. Risk areas assessed as having significant potential for adverse impact on labour or human rights are prioritized for further follow-up.

As part of Greencarrier Liner Agency's ongoing annual due diligence process, a structured supplier assessment was conducted based on both financial materiality and risk indicators.

Suppliers were evaluated using an updated Transparency Act questionnaire covering human rights governance, risk assessments, supplier management practices, monitoring activities, corrective action procedures and whistleblowing mechanisms.

The assessment process follows a risk-based methodology whereby suppliers are prioritized according to their significance to the business, geographical exposure, industry sector and potential human rights risks within their operations and supply chains.

The responses received are used to assess supplier alignment with Greencarrier Liner Agency's standards and to identify any areas requiring further clarification, dialogue or follow-up.

A more detailed analysis is conducted for risk focus areas identified as presenting a significant risk. Areas determined to pose a high risk of potential adverse impacts or violations of labour and human rights are closely monitored, and specific measures are implemented. Areas not considered high-risk are followed up through ongoing monitoring and included in the annual risk analysis process.

3.1.2 Further Follow-up and Measures

Risk areas assessed as posing a significant risk of adverse impacts or violations of labour and human rights shall be closely monitored with regard to mitigating, reducing, or eliminating the identified risks. When such issues are identified, Greencarrier Liner Agency shall:

- Implement appropriate actions to stop, prevent, or mitigate negative impacts
- Monitor the implementation and effectiveness of these measures
- Communicate with affected stakeholders and rights holders regarding how the issues are being addressed
- Ensure remediation and compensation where necessary, either independently or in collaboration with relevant partners

In addition, Greencarrier Liner Agency undertakes continuous improvement measures in the area of labour and human rights, including for selected risk focus areas where no current violations have been identified. This proactive approach reflects our commitment to long-term development and prevention.

4. REPORT

4.1 Internal Risk Assessment

Labour and human rights remain critical focus areas for Greencarrier Liner Agency. The company is committed to upholding high standards to ensure a fair, inclusive, and safe working environment.

An internal risk assessment was conducted to evaluate labour and human rights risks, review existing measures, and assess the effectiveness of current policies.

The overall conclusion indicates a **generally low risk** of labour and human rights violations within the company's own operations. However, specific areas—such as **gender balance in leadership positions**—have been identified as requiring **continued focus and improvement**.

A structured risk analysis was carried out based on the identified focus areas. This analysis encompasses both actual and potential risks and evaluates the adequacy of existing mitigation measures.

Risk Area	Measures Implemented	Responsible Department	Risk Level
Gender equality, including equal pay	<ol style="list-style-type: none"> 1. Policy on labour and human rights 2. Equality and diversity policy 3. KPIs and objectives 4. Role evaluation for equal pay 	HR	Low
Discrimination	<ol style="list-style-type: none"> 1. (Health, Safety, and Environment) HSE procedures 2. Whistleblowing channel 3. Key Performance Indicators (KPIs) 4. Employee surveys 5. Regular risk assessments 	HR	Low
Right to social security	Continuous Compliance Monitoring and Policy Governance	HR	Low
Female representation in leadership roles	<ol style="list-style-type: none"> 1. Recruitment strategy 2. Gender balance targets 	HR	Medium
Safe working conditions	<ol style="list-style-type: none"> 1. Set KPIs, action plans, and improvement goals 2. Conduct annual safety inspections 3. Provide training for handling threatening situations 	HR	Low

Working hours	Regular discussion of overtime statistics in the Work Environment Committee	HR	Low
Fair wages	<ol style="list-style-type: none"> 1. Implement a policy on labour and human rights 2. Maintain a collective bargaining agreement 3. Introduce a fixed equal pay fund in local negotiations 4. Analyze salary statistics 	HR	Low

4.2 Supply Chain Risk Mapping

During the reporting period, Greencarrier Liner Agency Norway AS conducted a structured supplier mapping exercise in accordance with the Norwegian Transparency Act.

The supplier population consisted of 187 suppliers with whom the company maintained business relationships during the reporting period.

As part of Greencarrier Liner Agency's ongoing annual due diligence process, a three-step supplier selection methodology was applied:

- Mapping of the complete supplier population.
- Selection of material suppliers based on a financial threshold of NOK 2 million in annual transaction value.
- A complementary risk-based sample of suppliers selected based on geographical exposure, operational activities and supply chain relevance.

The financial threshold was increased from NOK 1 million to NOK 2 million compared to the previous reporting year due to increased purchasing volumes while the supplier structure remained largely unchanged.

Certain entities were excluded from further assessment as they represented intra-group transactions, internal service providers or agency relationships rather than direct supplier relationships.

4.3 Summary of Responses

Questionnaires were distributed to suppliers included within the final assessment scope.

The questionnaire covered:

- Human rights and labour policies.

- Governance and accountability.
- Risk assessment processes.
- Supplier management and controls.
- Monitoring and audit activities.
- Corrective actions and whistleblowing procedures.

The responses received to date indicate that assessed suppliers generally have established policies and procedures addressing human rights and decent working conditions. Most respondents reported that they conduct regular risk assessments, maintain whistleblowing mechanisms and require suppliers to adhere to codes of conduct or equivalent standards.

No responding supplier reported any material adverse impacts related to human rights or decent working conditions during the reporting period.

4.4 Limited Data Availability

At the time of publication, responses had been received from four of the eight suppliers included in the assessment scope.

A limited number of suppliers had not yet submitted completed questionnaires. These cases have been classified as pending assessments rather than indications of non-compliance.

Greencarrier Liner Agency will continue engaging with these suppliers and review the outstanding responses as part of the ongoing due diligence process.

4.5 Initial Supplier Risk Categorization

Based on the supplier assessment process, suppliers were categorized according to operational characteristics, geographical exposure and industry-related risks.

Particular attention was given to suppliers operating within:

- Port and terminal operations.
- Freight forwarding and logistics services.
- Transportation services.
- Suppliers operating in or connected to higher-risk geographical regions.

Suppliers operating within transportation, logistics and terminal-related services were generally assessed as medium-risk suppliers due to the nature of their operations and potential exposure to subcontracting arrangements.

No suppliers were identified as high-risk requiring immediate remediation measures.

4.6 Planned Supplier Follow-Up Actions

Based on the results of the 2026 assessment process, Greencarrier Liner Agency plans to:

- Continue follow-up with suppliers that have not yet responded.
- Review supporting documentation received from suppliers.
- Maintain dialogue with suppliers assessed as medium-risk.
- Continue annual supplier due diligence assessments.
- Strengthen contractual and documentation requirements relating to human rights and responsible business conduct.

Supplier engagement remains a key element of Greencarrier's due diligence framework and continuous improvement process.

4.7 Supplier Risk Assessment Outcomes

Based on information obtained through supplier questionnaires, supporting documentation and internal assessments, no confirmed violations of labour or human rights have been identified within Greencarrier Liner Agency's operations or supply chain.

Within the supply chain, certain transparency and data challenges persist. Greencarrier Liner Agency applies a risk-based due diligence framework in accordance with the Transparency Act and international guidelines, with an emphasis on prevention, remediation, and responsible supplier engagement.

4.8 Overall Summary and Reflection

4.8.1 Confirmed Violations and Risk Overview

No confirmed violations of labour or human rights have been identified within Greencarrier Liner Agency's operations or supply chain. This reflects the company's commitment to responsible business practices and active risk mitigation.

Ongoing monitoring and assessment processes are in place to ensure early identification and response to potential emerging risks.

4.8.2 Risk Analysis and Current Status

Based on the internal and supplier-related assessments conducted during the reporting period, no further in-depth analyses are considered necessary at this stage. However, Greencarrier maintains a responsive approach and is prepared to initiate new evaluations should operational risks or external factors change significantly.

4.8.3 Continuous Improvement and Commitment

Greencarrier Liner Agency is committed to ongoing development of responsible business conduct. The company upholds high standards of labour and human rights across all operations and expects the same of its suppliers.

A culture of transparency and openness is actively encouraged. Stakeholders and employees are invited to report any concerns via the secure whistleblowing channel. All submissions are reviewed by the Chief Compliance Officer (CCO), the Global HR Manager, and the Chief Financial Officer (CFO) at Greencarrier AB, and outcomes are reported to the Board of Directors as part of the group's accountability structure.

The Transparency Act statement has been approved and signed by the board of directors and the managing director of Greencarrier Liner Agency Norway AS.

Gothenburg, 30 June 2026

Marius Lien

Managing Director of Greencarrier
Liner Agency Norway AS.

Svante Johansson

Board member of Greencarrier
Liner Agency Norway AS.

Följande handlingar har undertecknats den 8 juli 2026



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