



This Modern Slavery statement is made by Axess AS and is applicable to all Axess subsidiaries. This statement is made pursuant to the UK Modern Slavery Act 2015 Section 54 and to the Norwegian “Act relating to enterprises’ transparency and work on fundamental human rights and decent working conditions” (Transparency Act 2022).

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our affiliated companies, contractors, suppliers, and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, managers, contractors, freelancers, external consultants, third-party representatives, and business partners.

Responsibility for the policy

As parent company of the Axess Group, the board of Axess AS acknowledges its responsibility for the ethical and strategic direction of the group. Operational management is delegated to the Chief Executive Officer of Axess AS.

The Chief Executive Officer has directed the establishment of a cross-functional working group, including HR- and HSSEQC Director to assess and respond to the requirements of anti-slavery legislation.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved.

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Comments, suggestions, and queries are encouraged and should be addressed to the CEO.

Compliance with the policy

You must ensure that you read, understand, and comply with this policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager or a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Whistle blowing system.

Training

During 2021 we focused on enhancing the participants' understanding of modern slavery and their ability to handle this in our operations and supply chains.

Specifically, we have focused on this in our training:

- human rights training course, including a section on modern slavery
- human rights in supply chain, including modern slavery aspects

The training is available for all employees, hired freelancers and suppliers.

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The aim in 2022 is to understand, assess and focus on our responsibility to promote and ensure respect for fundamental human rights and decent working conditions in our supply chain.

We will continue to work on ways to reinforce the importance of preventing modern slavery, and breach if human rights and decent working conditions in our organisation and through employee training and communications.

The Board of Directors of Axess AS and Axess North Sea LTD have reviewed and approved this statement. They confirm that to the best of their knowledge the information presented in the statement has been prepared in accordance with the requirements of Section 54 of the UK Modern Slavery Act 2015 and associated regulations. The signing has been delegated to the Chief Executive Officer of Axess AS.



Lasse Iversen
Chief Executive Officer
Axess AS

Molde – 23.08.2022

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