



# TRANSPARENCY REPORT 2025



Hiking in Cape Town, South Africa

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# EXECUTIVE SUMMARY

At Axess Group, we conduct annual due diligence assessments covering human rights, decent working conditions, and corruption risk in accordance with the Norwegian Transparency Act and the OECD Due Diligence Guidance for Responsible Business Conduct.

## Scope and methodology

The 2025 assessment covered the 25 largest Group suppliers by spend and the 25 largest suppliers within each of the five operating regions, totalling 125 suppliers. For the first time, we applied the assessment consistently across global entities and introduced a two-dimensional risk model combining inherent risk, based on country context and industry exposure, and residual risk that reflects gaps in our own due diligence measures.

## Key findings

We identified no concerns about adverse impacts on human rights or decent working conditions in 2025. At Group level, most of the largest suppliers (76%) were assessed as low risk. However, our assessment at the regional level shows a more mixed picture. We did identify some due diligence gaps, elevated risk in a few specific supplier relationships, and some cases where audit findings or supplier follow-up indicated that Axess' standards were not fully met. Across the five regions, three broad patterns emerge:

- **Process gaps:** Europe and Axess Technologies operate in a very low inherent risk environment. However, gaps in supplier agreements and audits mean that the actual risk we face could be higher than the inherent risk alone would suggest.
- **Mitigation-effective:** Americas and APME (Asia Pacific and Middle East) operate in regions with an elevated inherent risk, yet mitigation is measurably offsetting that exposure. Americas shows the strongest effect, while APME's margin is narrower. The large populations of medium-risk suppliers in both regions remain an indicator of emerging risk if controls are not further strengthened.
- **Compound exposure:** Africa exhibits the most significant mitigation gap, compounding an already elevated inherent risk and making it the region requiring the most immediate attention.

## Priority actions for 2026

- We will prioritise closing gaps in the due diligence process, with regard to the supplier approval process, audits and signed supplier commitments across regions and entities to reduce overall risk.
- We will continue strengthening supplier dialogue, audits, and evaluations to address human rights and decent working conditions more consistently across the Group, with the introduction of a Human Rights Roadmap as a broader initiative to strengthen our approach.
- We will use a quarterly KPI to track the closure of supply chain due diligence gaps, and we will introduce a new Supply Chain Management Standard at the Group level to drive compliance and consistency across all global entities.

# 1 INTRODUCTION

## 1.1 About this report

This report describes how we identify, prevent, mitigate, and follow up on adverse impacts on human rights, working conditions, and corruption in our supply chain. In doing so, we aim to promote transparency, demonstrate our commitment to responsible business practices, and contribute to positive change in the industries in which we operate, in line with the Norwegian Transparency Act and the OECD Due Diligence Guidance for Responsible Business Conduct.

This report covers the 2025 reporting year and is intended to provide a clear and transparent overview of our due diligence work across the Group. The report includes a consolidated Group analysis as well as regional analyses of our five main operating regions: Europe, Axess Technologies, Americas, Asia Pacific and Middle East (APME), and Africa. We also cover the reporting requirements for Axess Technologies AS and Axess Asset Integrity AS as Norwegian companies subject to the Norwegian Transparency Act. As part of Axess Group, they follow the same due diligence process and share the same risks as the broader Group. Their status is reported separately under the regional section in Chapter 5 for full clarity and transparency.

From working with suppliers in many countries around the world, we recognise the impact we have on our value chain, and that meaningful, long-term progress depends on strong collaboration. Therefore, we are committed to open dialogue with our suppliers about the risks and challenges in their supply chains, so that we can identify and implement improvements over time.

Due diligence also applies to our existing operations in high-risk countries, as well as when conducting new projects or establishing new offices in high-risk countries. As these internal processes are under our direct control, the primary focus of this report is on responsible business conduct within our supply chain.

## 1.2 About Axess Group

Axess Group is fully owned by Axess AS, a Norwegian company headquartered in Molde. Axess operates across 27 countries and 34 offices worldwide spanning five operating regions: Europe, Americas, Africa, Asia Pacific and the Middle East (APME), and Axess Technologies. This report includes all companies within Axess Group in which Axess AS, either directly or through one of its subsidiaries, holds more than 50% of the shares. A full list of the companies covered by this report is provided in [Appendix A](#).

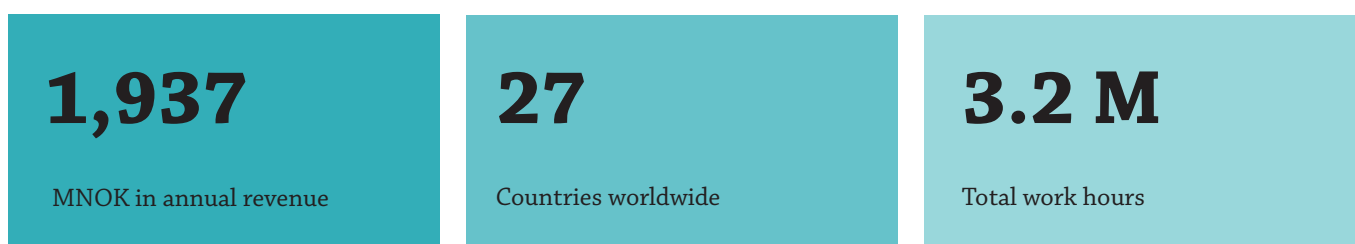


Figure 1. Axess Group key figures 2025

Companies included in the report:	<b>Axess Group</b> (Axess AS and all its global subsidiaries)
Names of businesses required to report:	Axess AS (parent company)
	Axess Technologies AS (fully owned by Axess AS)
	Axess Asset Integrity AS (fully owned by Axess AS)
Address of Axess AS headquarters:	Grandfjæra 22C, 6415 Molde, Norway
Main services, products, and solutions:	Engineering and integrity solutions
Main market sectors:	Oil and gas, wind energy, marine, and infrastructure industries
Own employees as of 31.12.2025:	Axess Group: 835
	Axess Technologies AS: 103
	Axess Asset Integrity AS: 120
Annual revenue in 2025:	Axess Group: 1,937.4 MNOK
	Axess Technologies AS: 567.4 MNOK
	Axess Asset Integrity AS: 451.4 MNOK

Table 1. Overview of Axess Group and its operating regions

# 2 RESPONSIBLE SUPPLY CHAIN

## 2.1 Axess' commitment to a responsible supply chain

Axess Group operates in industries where supply chain integrity directly affects the health and safety of people, the environment, and the communities in which we work. For us, sustainable growth is rooted in our continuous development as a responsible business, and a key pillar of this work is maintaining a responsible supply chain. A responsible supply chain means that all parties in the value chain contribute to the promotion of human rights, decent working conditions, environmental responsibility, and the prevention of corruption. Axess' success depends on collaboration with our suppliers and business partners, where we work systematically together to take responsibility for the working conditions in our supply chain.

Our 'We Values' form the basis for our ethical standards and compliance, both in our own operations and in our interactions with business partners. Responsible business practices are governed through our Code of Conduct, which clearly sets out our ethical commitments, requirements, and expectations for personal conduct and business practices, and is further supported by our HSEQ Policy, Human Rights Policy, Anti-Corruption Policy and Modern Slavery Statement. Our governing documents are communicated internally, supported by mandatory employee training, shared with our suppliers, and publicly available on Axess' website [1].

The strategy and working process for responsible business conduct at Axess Group are anchored in management. The Board of Directors monitors and evaluates this work, and the Director of Responsible Business regularly reports the status to the Board on behalf of Axess' management. Responsible business conduct is actively monitored through quarterly KPIs in all regions and reported in Axess' annual sustainability report [2].

When evaluating supply chain risks within the Group, we also assess activities within our own companies. This is particularly important for the Group, as many serve as suppliers to one another. We continuously monitor indicators of a healthy working environment and promote transparency and good working conditions for employees across the organisation.

## 2.2 Suppliers' commitment to a responsible supply chain

Axess' suppliers are expected to conduct business in line with our standards and business ethics, including efforts to reduce greenhouse gas (GHG) emissions. We also expect suppliers to engage in open dialogue on human rights, decent working conditions, and corruption risk in their operations and value chains. In the case of breaches, we expect full collaboration to improve these conditions. This process is important in Axess' work towards a responsible supply chain, as audits and checklists will not contribute to significant improvements on their own.

[1] Axess Group. (n.d.). <https://www.axessgroup.com/>

[2] Axess Group. (2026). GHG Emissions Report 2025. <https://www.axessgroup.com/wp-content/uploads/2026/04/Sustainability-Report-2025-final.pdf>

Suppliers also have access to Axess' anonymous whistleblower channel through our website to report any possible misconduct related to their activities with us.

## 2.3 Due diligence process

At Axess Group, all suppliers are subject to our structured due diligence process, communicated and embedded across our contracts, supply chain management processes, guidelines, and procedures. It is designed to ensure our supply chain consistently meets our standards on human rights, working conditions, and business ethics.

- **Registration:** Every supplier must be listed in our supplier register before they can work with us.
- **Approval:** Suppliers must complete a formal approval process to confirm they meet our requirements and standards.
- **Supplier commitment:** Suppliers are asked to sign our supplier commitment, which is a formal declaration through which they confirm alignment with Axess' key governing documents. Over time, we aim for all suppliers to sign the supplier commitment, with prioritisation of Criticality 1 (most critical to our operation) and Criticality 2 suppliers.
- **Audits:** All Criticality 1 and 2 suppliers must undergo, at a minimum, a desktop review within their first year of agreement, with the information refreshed every three years. Criticality 1 suppliers are additionally subject to periodic formal audits every three years, while others are assessed based on an individual evaluation.
- **Annual scorecards:** Each supplier is scored annually to track and evaluate their performance over time and identify areas requiring improvement.

The results of each annual due diligence cycle inform our risk assessment, guide our follow-up actions, and drive continuous improvement, as described in the next chapters.



Discussion in Norway

# 3 METHODOLOGY FOR ASSESSING ADVERSE IMPACT

## 3.1 Methodology basis

At Axess Group, we apply a methodology based on the OECD Due Diligence Guidance [3] to assess risks related to human rights, decent working conditions, workplace health and safety, environmental issues, and bribery and corruption. The methodology provides the basis for how supplier risk is assessed, prioritised, and followed up across our global entities.

## 3.2 Assessment scope and prioritisation

Supply chain remains a key focus area in our assessment because significant risks related to human rights and decent working conditions may arise through our suppliers, subcontractors, and other upstream business relationships, where we have less direct oversight and influence than in our own operations.

This report presents: a consolidated Group analysis of the 25 largest external suppliers by spend, and regional analyses of the 25 largest suppliers within each of the five operating regions, totalling 125 suppliers. In addition, we began assessing the five largest suppliers within each entity in 2025 to strengthen risk identification at the entity level and support their audit plans for 2026.

Supplier spend remains the main basis for selecting the assessed populations, and supplier criticality is used to prioritise follow-up.

## 3.3 Risk methodology

To improve comparability and clarity in assessments across the Group, we introduced a two-dimensional supplier risk metric in 2025 based on inherent risk and residual risk.

### Inherent risk

Inherent risk reflects the supplier's underlying risk profile based on the country context and the type of industry or products provided. For country risk, we draw on the following internationally recognised indicators:

- Human Rights Index (HRI) by Our World in Data
- Transparency International's Corruption Perceptions Index (CPI)
- International Labour Organization (ILO) ratification status for the Occupational Safety and Health Convention, 1981 (C155)
- ILO ratification status for the Promotional Framework for Occupational Safety and Health Convention, 2006 (C187)
- EU and UN sanctions status
- The Global Cybersecurity Index (GCI) published by the International Telecommunication Union (ITU)

For industry risk, we apply the High Risk List published by the Norwegian Agency for Public and Financial Management (DFØ). Four categories are particularly relevant to our supply chain: IT, electronics, metal, and textile (including ropes).

### **Residual risk**

Residual risk reflects the risk that remains after considering our own due diligence measures or gaps in those measures. It is assessed based on whether the supplier:

- is registered in our internal supplier register
- is formally approved in line with our supplier processes
- has signed the supplier commitment
- has been audited within the past three years

These gaps are weighted by supplier criticality, where Criticality 1 is the highest level, so that gaps linked to more critical suppliers result in a higher residual risk score. Supplier criticality is determined internally in line with Axess' procedures and may vary slightly across regions depending on operational contexts.

### **Composite risk score**

The composite risk score combines inherent and residual risk on a scale from 0 to 18, with inherent risk scored from 0 to 9 and residual risk from 0 to 9, and both carrying equal weight in the model. This means that the external context in which a supplier operates and the completeness of our own due diligence measures contribute equally to the composite score. Suppliers scoring below 4.5 are classified as low risk, 4.5 to 9 as medium risk, 9 to 13.5 as high risk, and 13.5 to 18 as very high risk. These thresholds are applied consistently across all Group and regional analyses.

The composite score works in both directions. A supplier with higher inherent risk may still score lower overall if mitigation measures are strong, while a supplier in a lower-risk context may still require attention if key follow-up activities remain incomplete. The model is therefore intended to identify both external supplier exposure and gaps in our own due diligence implementation, and to support more consistent prioritisation of follow-up actions across the Group.

## **3.4 Methodology limitations**

The model has inherent limitations that are relevant when interpreting the results. Inherent risk scores draw on publicly available country-level indicators rather than direct supplier verification and therefore reflect contextual conditions rather than confirmed supplier behaviour. The spend-based selection of the assessed populations may also mean that smaller suppliers with higher risk profiles fall outside the assessed scope. These limitations are acknowledged in the interpretation of the results. The model is intended to support prioritisation and direct follow-up rather than provide definitive conclusions about individual suppliers.

Each legal entity within Axess Group is responsible for following up all of its own suppliers and implementing corresponding action plans, while this report provides a high-level overview of the most critical elements based on the 25 largest suppliers at the Group and regional level, and therefore does not reflect the full scope of entity-level supplier management.

[3] OECD. (2018). OECD Due Diligence Guidance for Responsible Business Conduct. [https://www.oecd.org/content/dam/oecd/en/publications/reports/2018/02/oecd-due-diligence-guidance-for-responsible-business-conduct\\_c669bd57/15f5f4b3-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2018/02/oecd-due-diligence-guidance-for-responsible-business-conduct_c669bd57/15f5f4b3-en.pdf)

# 4 GROUP ASSESSMENT

The 2025 assessment introduces our two-dimensional risk model. The results below reflect the Group's current risk profile and the state of our due diligence implementation as of the 2025 reporting year.

## 4.1 Group supplier profile

At Group level, we assess the relationship between supplier spend, risk, and criticality to understand how closely these factors correlate. One of the clearer findings from our supplier assessment in 2025 is that our largest suppliers are not always those most exposed to risk, and those most exposed are not always the largest.

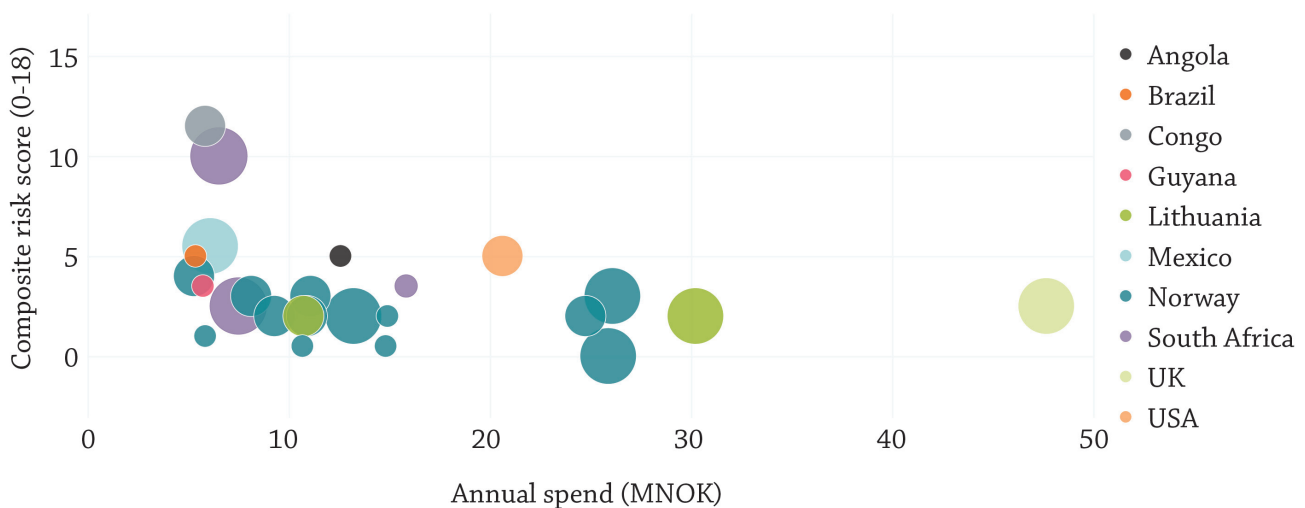


Figure 2. Group top 25 suppliers: spend and composite risk score. Marker size reflects supplier criticality (largest size: Criticality 1), and colour indicates supplier country

Figure 2 shows that our largest suppliers are generally not the riskiest ones, as they tend to receive our closer attention due to their large scale of procurement. We therefore focus our follow-up at the Group level on suppliers where risk is higher, even if they are within a lower spend concentration, as the potential consequences of disruption, non-compliance, or weak due diligence could still be greater.

Out of our 25 largest suppliers at Group level, 13 of them operate in Norway, as shown in Figure 3. As Norway is a low-risk country in this context, the Group profile appears broadly manageable at this level of analysis. However, even a small share of suppliers with a higher-risk profile in countries such as Mexico, The Republic of the Congo, and South Africa can raise our overall risk, particularly where our due diligence work is not yet as thorough. This is why we prioritise follow-up at the Group level based on where risk is higher, not necessarily based on spend alone.

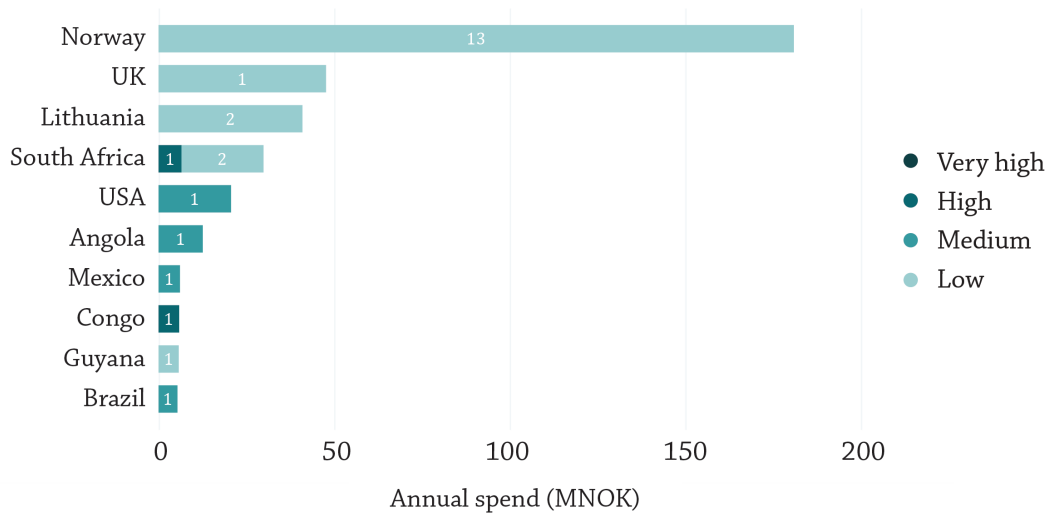


Figure 3. Group top 25 suppliers: annual spend by country of supplier, with supplier count by risk band. The numbers shown within each risk band represent the number of suppliers

## 4.2 Group risk distribution

Looking at the top 25 suppliers for the Group, Figure 4 shows that 19 out of 25 suppliers (76%) are concentrated in the low-risk band. Four suppliers fall within the medium-risk band and two within the high-risk band, while none are classified as very high risk.

For the medium- to high-risk suppliers in this group, we examine whether elevated risk is driven by the supplier's country and industry type or by gaps in our due diligence controls. Figure 5 breaks down the composite risk into average inherent and residual risk scores by country.

Norway, with 13 of the 25 suppliers in the Group population, shows the lowest risk, anchoring the Group profile. One of our suppliers in Mexico has the highest inherent risk among the population, although its mitigation gap is closed and it remains within the medium-risk band overall, demonstrating the effect of good due diligence. One supplier in The Republic of the Congo combines elevated country risk with an incomplete process, and the related case is addressed in Chapter 5.

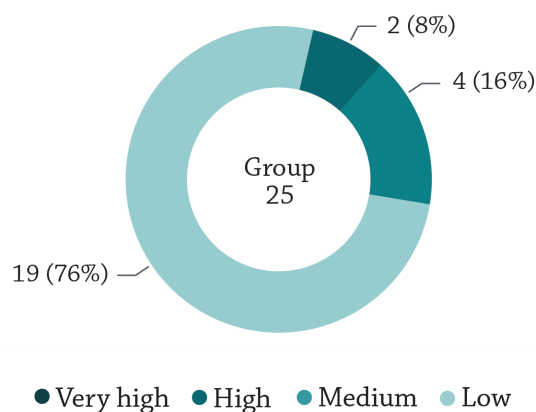


Figure 4. Group top 25 suppliers: composite risk distribution

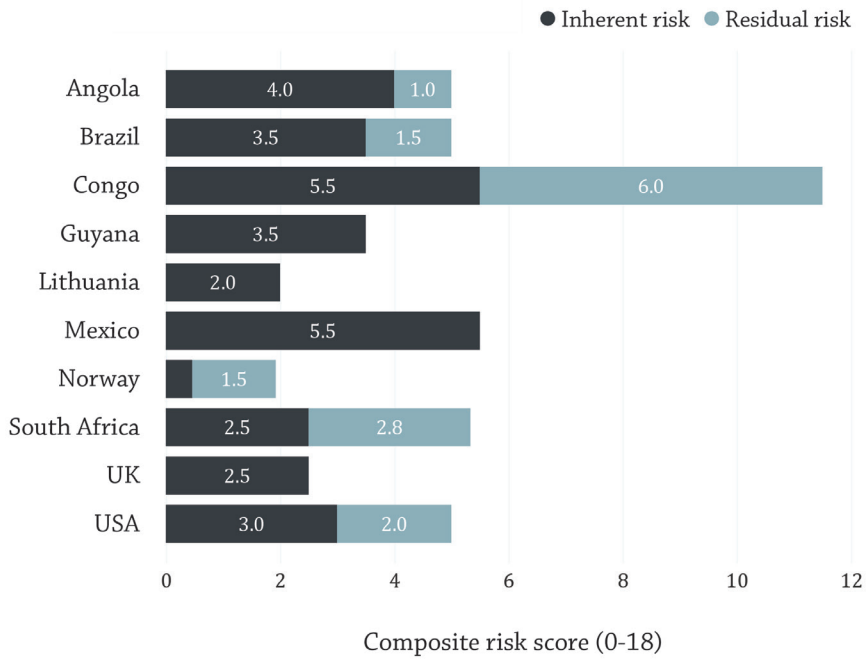


Figure 5. Group top 25 suppliers: average inherent and residual risk scores by supplier country

Industry and product exposure adds another layer to our risk analysis. Alongside the broader supplier categories related to Services (covering operational support and subcontracted activities) and Finance (covering banking institutions, insurance, and consulting), the supplier category distribution in Figure 6 shows where DFØ-related exposure sits within the Group’s supplier base.

Within the Group top 25, six suppliers fall within high-risk industries. One of the two suppliers classified under the IT category provides software services and is therefore excluded from the DFØ count. Even where suppliers fall within lower composite risk bands overall, their higher industry exposure remains a relevant focus for Group follow-up priorities.

None of the supplier countries within the Group top 25 population are subject to EU or UN sanctions.

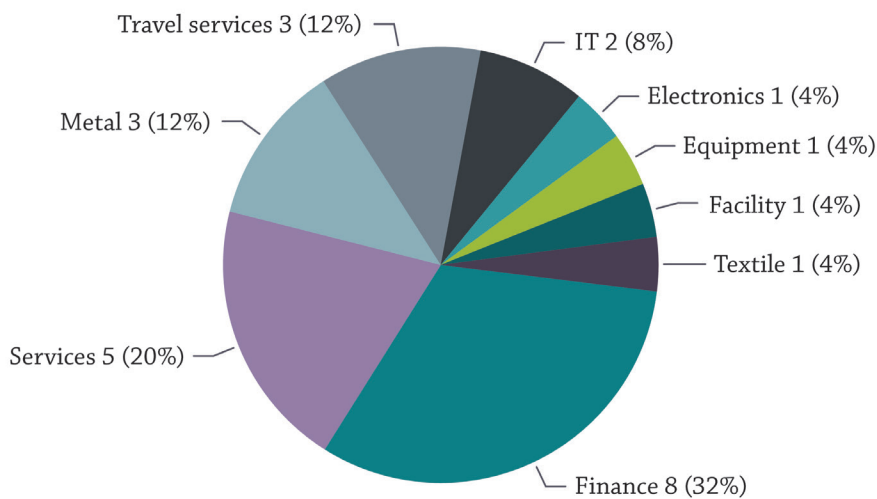


Figure 6. Group top 25 suppliers: distribution by supplier category

### 4.3 Group overview across regions

The Group top 25 analysis reflects the largest suppliers by Group-wide spend. This approach captures the most significant supplier relationships at Group level, but does not necessarily provide a complete picture of risk across all operating regions. Some regions may have no suppliers above the Group spend threshold and are therefore absent from the previous analysis. To address this, we apply a secondary approach based on the top 25 suppliers in each of our five operating regions, totalling 125 suppliers.

When comparing the 125 suppliers by composite risk band with the Group top 25 population, the regional population shows a broader spread, with 58% classified as low risk, 32% as medium risk, and 10% as high risk, while no supplier is classified as very high risk.

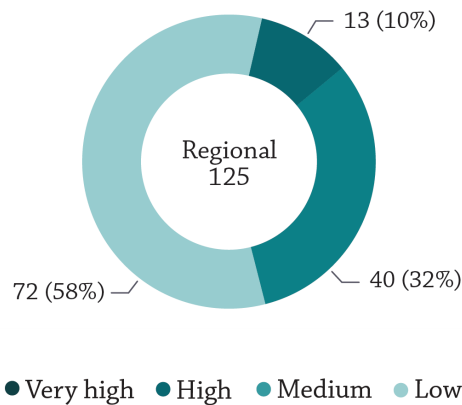


Figure 7. Regional top 25 suppliers: composite risk distribution

Figure 8 supports this by showing the spend-versus-risk distribution of these suppliers across our five operating regions. It confirms that suppliers within APME remain concentrated at the lower end of spend and therefore do not appear in the Group top 25 population, even though their risk distribution ranges from low to high.

Regional spend is not directly comparable across regions, as spending power, local price levels, operating models, and activity levels differ. This reinforces the importance of performing due diligence on all suppliers. Chapter 5 therefore shifts to a more meaningful basis for comparison by examining the distribution of each region's top 25 suppliers by due diligence coverage, industry and country risk.

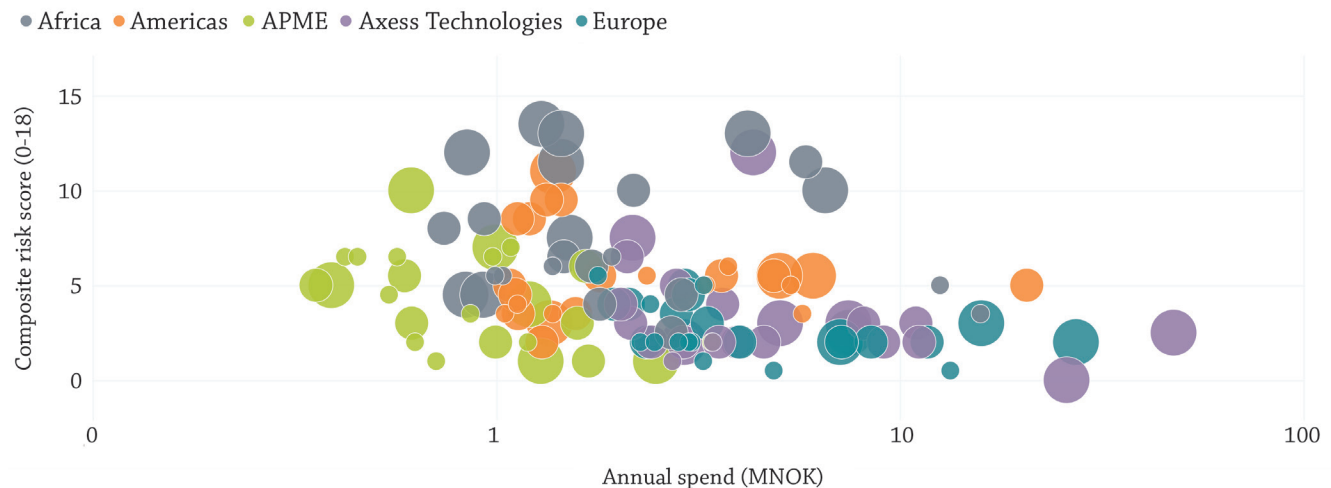


Figure 8. Regional top 25 suppliers: spend and composite risk score by region. The horizontal axis is shown on a logarithmic scale, and marker size reflects supplier criticality (largest size: Criticality 1)

# 5 REGIONAL ASSESSMENT

Chapter 4 shows that the Group's overall risk profile is broadly manageable, anchored in part by the concentration of spend in Europe and Axess Technologies, the two highest-spend regions, whose supplier bases are predominantly located in Norway and therefore carry the lowest risk in the Group. This chapter examines what lies beneath that picture: how risk is distributed within each of our five operating regions, what drives it in each case, and where follow-up needs to be prioritised.

Figure 9 shows average inherent and residual risk by region. Three distinct patterns emerge:

- **Process gap:** Europe and Axess Technologies operate in a very low inherent risk environment. However, gaps in due diligence, particularly in supplier agreements and audits, mean that the actual risk we face could be higher than the inherent risk alone would suggest.
- **Mitigation-effective:** Americas and APME operate in regions with higher inherent risk, yet mitigation is measurably offsetting that exposure. Americas shows the strongest effect. Both regions' medium-risk populations signal emerging risk if controls are not strengthened.
- **Compound exposure:** Africa exhibits the most significant mitigation gap, compounding an already elevated inherent risk, making it the region requiring the most immediate attention.

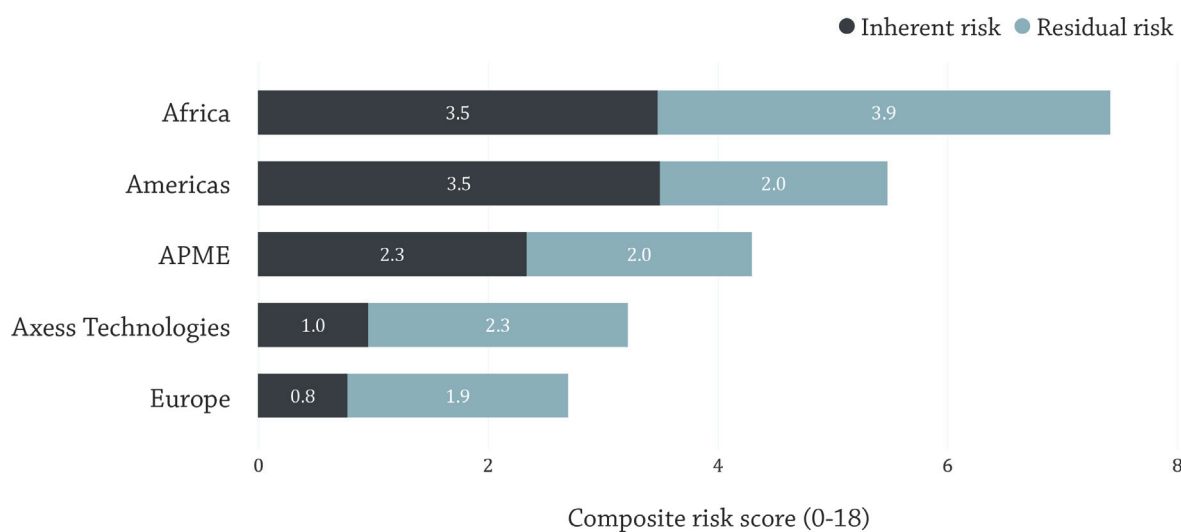


Figure 9. Regional top 25 suppliers: average inherent and residual risk scores by region

Figure 10 shows the overall risk distribution of the 25 largest suppliers in each region. On that basis, the profiles of Africa, Americas, and APME stand out more clearly than in the spend-weighted overview in the previous chapter. Figure 11 adds a geographic dimension by showing the country of each of our 125 suppliers, with marker size reflecting the number of suppliers per country.

The following sections examine each region in detail, using these figures as reference points throughout.

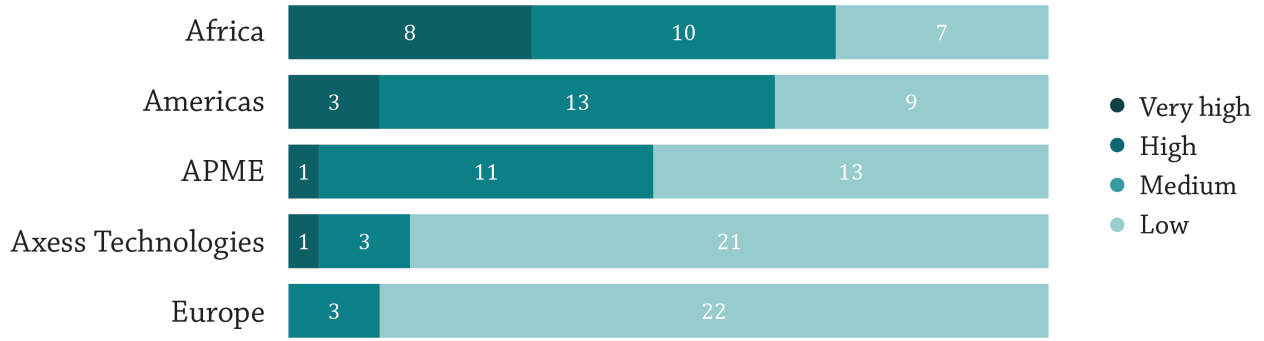


Figure 10. Regional top 25 suppliers: number of suppliers by risk band and region



Figure 11. Regional top 25 suppliers: geographic distribution by supplier country across all operating regions. Marker size represents the number of suppliers per country

## 5.1 Europe (including Axess Asset Integrity AS)

Europe presents a very low risk profile. Among the 25 largest suppliers assessed, 23 are direct suppliers of Axess Asset Integrity AS in Norway, and two are direct suppliers of Axess North Sea Ltd in the United Kingdom. The risk overview of these suppliers is presented in Table 2. The region's low inherent risk reflects both the relative stability of the regulatory environment in Norway and few suppliers from high-risk industries.

<b>Risk distribution</b>	Low (22), Medium (3), High (0), Very high (0)
<b>Average inherent risk (0-9)</b>	0.8
<b>Average residual risk (0-9)</b>	1.9

Table 2. Europe: regional risk overview, top 25 suppliers

Europe's residual risk is also low, although it exceeds the inherent risk, indicating that due diligence measures have not yet fully matched the risk environment and there is still room for improvement, particularly on supplier commitments and audits. Among the top 25 suppliers in Europe, 10 are large corporations within insurance, banking, consultancy, and facility management. These companies are typically difficult to engage with regarding audits and supplier commitments due to their size, but we have also not prioritised them so far, because they do not pose a high risk to our operations.

Overall, the majority of suppliers (22 of 25) remain in the low composite risk band. The goal in 2026 is to continue strengthening supplier commitment coverage and audit follow-up for large and critical suppliers. In addition, we implemented a supplier scorecard for all Criticality 1 suppliers at the end of 2025, and we completed seven evaluations in Europe. Our next step is to share the results with suppliers and introduce a two-way discussion around human rights and decent working conditions based on that feedback.

In Europe, we have an ongoing risk-based supplier audit programme, focused on a three-year audit cycle for all Criticality 1 suppliers. Over the last three-year period, we have audited two Criticality 1 suppliers and two suppliers of lower criticality. For 2026, we have planned three more audits to target the remaining high-criticality suppliers, as well as to incorporate coverage of suppliers in high-risk countries and industries.

Table 3 presents the country and industry overview of Europe. Among our top 25 suppliers in Europe, Lithuania presents the most elevated country risk in the region, having ratified neither C155 nor C187 and carrying a lower corruption index score. This means that suppliers there operate in an environment where systemic gaps in labour rights and anti-corruption frameworks are more likely, regardless of individual supplier conduct.

Country	Suppliers	Approved	Signed	Audited	DFØ classified
Norway	18	17	8	2	Metal (1), IT (1), Textile (1)
UK	3	2	0	0	-
Lithuania	2	2	2	2	-
France	1	1	0	0	Electronics (1)
South Korea	1	0	0	0	Electronics (1)

Table 3. Europe: country and industry overview

Five of the 25 suppliers operate in high-risk industries such as the production of metal, textile, electronics, and IT products. At time of reporting, three of these suppliers have not yet been audited, including one supplier of lifting equipment (Norway) and two suppliers of inspection instruments (France and South Korea). They are now scheduled for assessment in the next assessment cycle.

Key actions towards our suppliers in Europe in 2025:

- Two suppliers in Lithuania were flagged on the basis of both operational criticality and elevated country risk. Full audits were completed. Lithuania's non-ratification of ILO C155 and C187 was a contextual concern, but no critical issues were identified at the supplier level. Both suppliers remain within the low-risk band.
- We have taken a more targeted approach to get all remaining Criticality 1 suppliers for Axess Asset Integrity AS to sign our supplier commitment in 2025. However, engaging larger corporations on this remains a challenge due to competing priorities. These suppliers are considered very low risk to us, but to close the gap in 2026, we will implement desktop audits as an alternative method to cross-check their internal commitments against our supplier requirements.
- As the United Kingdom has not yet ratified ILO C155, we have approached our suppliers with the requirement to sign our supplier commitment and allow us to perform an audit where relevant. One supplier did not meet this minimum requirement, which has been documented for any future assessment and potential re-engagement with this supplier.



Inspection in Norway

## 5.2 Axess Technologies (including Axess Technologies AS)

Axess Technologies presents a low risk profile. All 25 assessed suppliers are direct suppliers of Axess Technologies AS, 16 of which are based in Norway, keeping the country risk low for the majority of the supplier base. The risk overview of the 25 suppliers is presented in Table 4, showing both average inherent risk and residual risk remain low.

<b>Risk distribution</b>	Low (21), Medium (3), High (1), Very high (0)
<b>Average inherent risk (0-9)</b>	1.0
<b>Average residual risk (0-9)</b>	2.3

Table 4. Axess Technologies: regional risk overview, top 25 suppliers

The main risk exposure in the region stems from the type of products and services sourced. As shown in Table 5, nine suppliers fall within DFØ high-risk industries, which has driven most of our follow-up effort in the region. We also have a subset of suppliers in Poland and Lithuania where the country context adds to the exposure, as both countries have not ratified ILO Conventions C155 and C187 and carry lower corruption index scores. One supplier is located in the United Kingdom, which has not ratified ILO Convention C155.

Our due diligence coverage is relatively strong, contributing to the low residual risk score, with 17 of 25 suppliers (68%) having signed the supplier commitment and seven having been audited within the last three years. Residual risk remains above inherent risk, reflecting that our follow-up is still in progress for a number of suppliers, particularly in the metal products category where the combination of industry and country risk makes due diligence completion most important. This is where most of our effort in 2026 will be directed. Nevertheless, the majority of suppliers (21 of 25) are within the low-risk band.

In Axess Technologies, we have an ongoing risk-based supplier audit programme, focused on a three-year audit cycle for all Criticality 1 suppliers. Over the last three-year period, we have audited four Criticality 1 suppliers and three suppliers of lower criticality. Our primary goal in 2026 is to continue with our due diligence process and particularly closing the gap with our steel suppliers.

In addition, we implemented a supplier scorecard for all Criticality 1 suppliers at the end of 2025, and we completed four evaluations in Axess Technologies. Our next step is to share the results with suppliers and introduce a two-way discussion around human rights and decent working conditions based on that feedback.

Country	Suppliers	Approved	Signed	Audited	DFØ classified
Norway	16	16	11	2	Metal (3), Textile (1)
Poland	4	3	2	2	Metal (3)
Lithuania	2	2	2	2	-
Germany	1	0	0	0	Metal (1)
Sweden	1	1	1	0	-
UK	1	1	1	1	Metal (1)

Table 5. Axess Technologies: country and industry overview

Key actions towards our suppliers in Axess Technologies in 2025:

- Our supplier in the United Kingdom sits at the intersection of industry risk and country risk, as the United Kingdom has not ratified ILO C155. This supplier was audited, and no concerns of adverse impacts were found. The supplier has also signed our supplier commitment.
- In Poland, we successfully audited two of our metal suppliers, with no issues identified. Our third supplier was unresponsive, and this non-conformity is still open and noted for any further engagement.
- Two suppliers in Lithuania were flagged on the basis of both operational criticality and elevated country risk. Full audits were completed. Lithuania's non-ratification of ILO C155 and C187 was a contextual concern, but no critical issues were identified at the supplier level. Both suppliers remain within the low-risk band.
- One supplier in Norway operates in the textile industry, which is classified as a high-risk industry. The supplier completed the supplier commitment and audit, with no issues identified.
- One large banking institution in Norway has not agreed to sign our supplier commitment or undergo an audit. This supplier is considered very low risk to us, but to close the gap in 2026, we will implement a desktop audit as an alternative method to cross-check their internal commitments against our supplier requirements.



Site visit in Norway

### 5.3 Americas

Americas' top 25 suppliers carry an elevated inherent risk, as shown in Table 6, largely because most of our suppliers in the region operate in more challenging environments, with lower corruption index scores and limited ratification of ILO Conventions. This is the case across Mexico, Brazil, and Guyana, which together account for the majority of our supplier base in the region. Mexico alone accounts for 12 suppliers, nearly half of the 25 assessed, and the combination of a low corruption index score and non-ratification of C187 means our due diligence process needs to be followed carefully.

<b>Risk distribution</b>	Low (9), Medium (13), High (3), Very high (0)
<b>Average inherent risk (0-9)</b>	3.5
<b>Average residual risk (0-9)</b>	2.0

Table 6. Americas: regional risk overview, top 25 suppliers

The majority of the supplier population (13 of 25) sits in the medium-risk band, which is expected given the inherent geographical risks. While this reflects a generally manageable situation, the size of the medium-risk population means that maintaining consistent due diligence coverage is important to prevent individual suppliers from moving into the high-risk band over time.

Despite the higher risk environment, residual risk in Americas falls well below inherent risk, reflecting that our due diligence efforts are having a measurable effect. In Americas, we have an ongoing risk-based supplier audit programme, focused on a three-year audit cycle for all Criticality 1 suppliers. Among the 25 suppliers, three Criticality 1 suppliers and six suppliers of lower criticality have been audited within the last three years, and 13 have signed the supplier commitment, as shown in Table 7. Several suppliers were not yet prioritised for audit in 2025 as they provide finance, travel, and administrative services where the operational risk to us is low.

In addition, we implemented a supplier scorecard for all Criticality 1 suppliers at the end of 2025, and we completed nine evaluations in Americas. Our next step is to share the results with suppliers and introduce a two-way discussion around human rights and decent working conditions based on that feedback.

Five supplier relationships were either non-recurring or discontinued during the year, accounting for most of the cases where the due diligence process has not been completed. In 2026, our main priority is to continue and extend audit coverage, and close any remaining gaps for higher-risk suppliers.

Country	Suppliers	Approved	Signed	Audited	DFØ classified
Mexico	12	7	7	5	Electronics (1), Metal (1)
USA	4	4	2	2	Textile (1)
Brazil	4	4	2	0	-
Guyana	2	1	1	1	-
China	1	1	1	1	Metal (1)
Norway	1	1	0	0	-
South Korea	1	0	0	0	Metal (1)

Table 7. Americas: country and industry overview

Key actions towards our suppliers in Americas in 2025:

- Our two most critical suppliers in high-risk industries completed the full due diligence process with no nonconformities. This included one supplier of electronics from Mexico and one metal supplier from China.
- One supplier of textile products in the United States, classified as a high-risk industry, completed the full due diligence process with no nonconformities.
- We had several one-off suppliers that had not completed our due diligence process, and we made efforts to ensure that the due diligence process would also be completed for one-off procurement going forward.



Team meeting in Brazil

## 5.4 APME

APME is a geographically diverse region, with the 25 largest suppliers spread across seven countries. Managing due diligence consistently across such a broad operational footprint is our main challenge in the region, and it is reflected in our results.

<b>Risk distribution</b>	Low (13), Medium (11), High (1), Very high (0)
<b>Average inherent risk (0-9)</b>	2.3
<b>Average residual risk (0-9)</b>	2.0

Table 8. APME: regional risk overview, top 25 suppliers

Table 8 shows the risk overview of the 25 largest suppliers in APME. While its average residual risk sits just below inherent risk, the margin is narrow, and 11 of 25 suppliers sit in the medium-risk band. While this reflects a generally manageable situation, the size of the medium-risk population means that maintaining consistent due diligence coverage is important to prevent individual suppliers from moving into the high-risk band over time.

Many of our medium-risk suppliers operate in India and the United Arab Emirates, where ILO Conventions C155 and C187 have not been ratified and where corruption and human rights index scores are lower, all of which contribute to higher inherent risk. Incomplete due diligence of these suppliers also increases the overall residual risk for the region. Closing the due diligence gaps consistently across APME is our goal in 2026.

Our due diligence coverage reflects our priorities so far. Out of the 25 suppliers, 11 have signed our supplier commitment. In APME, we have an ongoing risk-based supplier audit programme, focused on a three-year audit cycle for all Criticality 1 suppliers. Among the 25 suppliers, three Criticality 1 suppliers and one lower criticality supplier have been audited within the last three years, and five more have an audit plan for 2026. Six large corporations are related to insurance, consultancy, and facility management. These companies are typically difficult to engage with regarding audits and supplier commitments due to their size, but we have also not prioritised them so far, because they do not pose a high risk to our operations.

As shown in Table 9, four suppliers fall within high-risk industries, two of which were audited, one was a one-off procurement where an audit was not applicable, and one is scheduled for audit in 2026. Most suppliers with industry risk exposure are located in Australia, which carries lower country risk.

Country	Suppliers	Approved	Signed	Audited	DFØ classified
Australia	7	5	3	1	Metal (2), Textile (1)
India	6	4	4	1	-
UAE	5	1	1	0	-
Singapore	4	3	2	1	-
Brazil	1	1	0	0	-
Norway	1	1	0	0	-
Malaysia	1	1	1	1	Metal (1)

Table 9. APME: country and industry overview

In addition, we implemented a supplier scorecard for all Criticality 1 suppliers at the end of 2025, and we completed 13 evaluations in APME. Our next step is to share the results with suppliers and introduce a two-way discussion around human rights and decent working conditions based on that feedback.

In 2026, we will work to close the remaining due diligence gap by strengthening our supplier assessment process and actively following up with all remaining suppliers to complete our audit and supplier commitment requirements. This applies not only to our 25 largest suppliers by spend, but also to smaller suppliers where elevated inherent risk or gaps in our due diligence measures mean that closer attention is needed to ensure that our human rights and working conditions standards are met. In line with our supplier process, we will also implement desktop reviews within the first year of a new supplier agreement.

Key actions towards our suppliers in APME in 2025:

- We completed due diligence of our supplier in Malaysia, including the supplier commitment and a supplier audit. The audit was raised on a contextual concern regarding industry risk and we did not find any concerns regarding adverse impacts, but the supplier is being followed up on other nonconformities that are not directly relevant to this report.
- One supplier in Australia operating in the textile industry, which is also classified as a high-risk industry, signed the supplier commitment and is scheduled for audit in 2026.



Global operations meeting in Norway

## 5.5 Africa

Africa presents an elevated risk profile, shaped by high country risk and wide implementation gap in the due diligence process. Table 10 shows the distribution of the region's average inherent and residual risks.

<b>Risk distribution</b>	Low (7), Medium (10), High (8), Very high (0)
<b>Average inherent risk (0-9)</b>	3.5
<b>Average residual risk (0-9)</b>	3.9

Table 10. Africa: regional risk overview, top 25 suppliers

Out of the 25 largest suppliers, 10 are within the medium-risk band and eight are classified as high risk. The 25 suppliers are also spread across eight countries, with South Africa having the largest concentration, followed by Angola. Most supplier countries in the region have lower corruption index scores, and some have not fully ratified ILO Conventions, creating a more challenging environment for supply chain oversight. We found that the residual risk sits above inherent risk, meaning that gaps in our due diligence are currently compounding our risk exposure.

The majority of our long-term supplier relationships in the region are with suppliers in South Africa, where we have come the furthest with our due diligence process. As shown in Table 11, most of the suppliers are approved and many have signed our supplier commitment. All five suppliers from high-risk industries are also located here, where four of the five have signed our supplier commitment already.

Outside South Africa, our due diligence process is still new and we have identified some gaps to close. This has not been a priority yet, considering most of these suppliers carry lower criticality and operational risk, such as insurance, health service, and administrative service providers.

In Africa, we have an ongoing risk-based supplier audit programme, focused on a three-year audit cycle for all Criticality 1 suppliers. Out of the top 25 suppliers, nine have signed the supplier commitment and seven have been audited. This is quite a large gap in due diligence control, which we will focus on closing in 2026 by implementing a stronger focus on supplier commitment coverage, completing audits, and establishing a more standardised process for onboarding new suppliers before they reach significant risk and spend levels.

<b>Country</b>	<b>Suppliers</b>	<b>Approved</b>	<b>Signed</b>	<b>Audited</b>	<b>DFØ classified</b>
South Africa	11	8	7	4	Textile (3), Electronics (1), IT (1)
Angola	6	3	1	2	-
Rep. Congo	2	1	1	0	-
Senegal	2	1	0	0	-
Côte d'Ivoire	1	1	0	1	-
Ghana	1	1	0	0	-
UAE	1	0	0	0	-
USA	1	0	0	0	-

Table 11. Africa: country and industry overview

In addition, we implemented a supplier scorecard for all Criticality 1 suppliers at the end of 2025, and we completed 13 evaluations in Africa. Our next step is to share the results with suppliers and introduce a two-way discussion around human rights and decent working conditions based on that feedback.

Key actions towards our suppliers in Africa in 2025:

- In South Africa, we worked through our suppliers from high-risk industries with positive results. We completed the due diligence of two of these suppliers with no issues identified. We will continue the audit process for the remaining suppliers in 2026.
- Out of our two suppliers in The Republic of the Congo, one did go through the approval process and signed our supplier commitment in 2025. Future use of the other supplier is uncertain, and further steps to close the due diligence gap were therefore not prioritised with this supplier so far.
- Across our suppliers in Africa, specifically those based in Senegal, Angola, and Côte d'Ivoire, we identified that several suppliers are at early stages of the due diligence process and discussions were started on how we can establish consistent procurement procedures and due diligence processes across the region.



Team meeting in South Africa

# 6 RISK-REDUCING MEASURES

This chapter describes the prioritised measures, further work, and follow-up actions arising from our 2025 due diligence assessments. It also reflects how we work in practice to prevent and mitigate adverse impact, track implementation and results, address remediation where relevant, and communicate how impacts are being managed.

## 6.1 Ceasing, preventing, and mitigating adverse impacts

In line with the OECD Guidance, our due diligence process is designed to proactively prevent adverse impacts on people, the environment, and society. Where impacts or risks are identified, we are committed to taking immediate action to cease, prevent, and mitigate them. This may include enhanced control measures, more in-depth evaluations of high-risk suppliers, closer follow-up and dialogue, and supplier audits. Where necessary, we may also impose contractual requirements for suppliers to identify risks, establish preventive measures, and report relevant violations to Axess. We do not work with suppliers that expose Axess to elevated risks, and we are prepared to end supplier relationships in situations where our governing policies and expectations are not met.

Our 2025 assessments resulted in several concrete measures across the Group:

- We implemented a supplier scorecard for all Criticality 1 suppliers at the end of 2025, establishing an annual scoring process to get an overview of supplier performance across HSE, quality, working conditions, and ethical behaviour. In 2025, we delivered 46 evaluations, allowing us to address supplier issues and gain a Group-level overview of exposures, ongoing cases, and further actions needed.
- Some supplier relationships across the Group were ended in 2025 due to quality issues and lack of collaboration. None were terminated as a result of adverse impacts.
- Supplier commitments have been accelerated in high-risk regions and towards high-risk suppliers to establish control and reduce risk.
- Supplier audit programmes have been successfully implemented and executed across the Group. KPIs have been used at the management level to track audit progress throughout the year. Supplier audits are now also used as an effective tool to actively engage with high-risk suppliers.
- We developed a supplier dashboard to strengthen due diligence governance, enabling assessments of our largest suppliers at the Group, regional, and entity levels. This provides a periodic, up-to-date overview of risk exposure based on both inherent and residual risk assessments, serving as a baseline for prioritising follow-up actions and managing risk controls.
- Suppliers in high-risk industries are now also highlighted across regions for further follow-up.

From 2026, we will strengthen standardised approval and evaluation requirements prior to supplier engagement, including for one-off or non-recurring suppliers, and improve procurement standards across the Group through the introduction of a Supply Chain Management Standard.

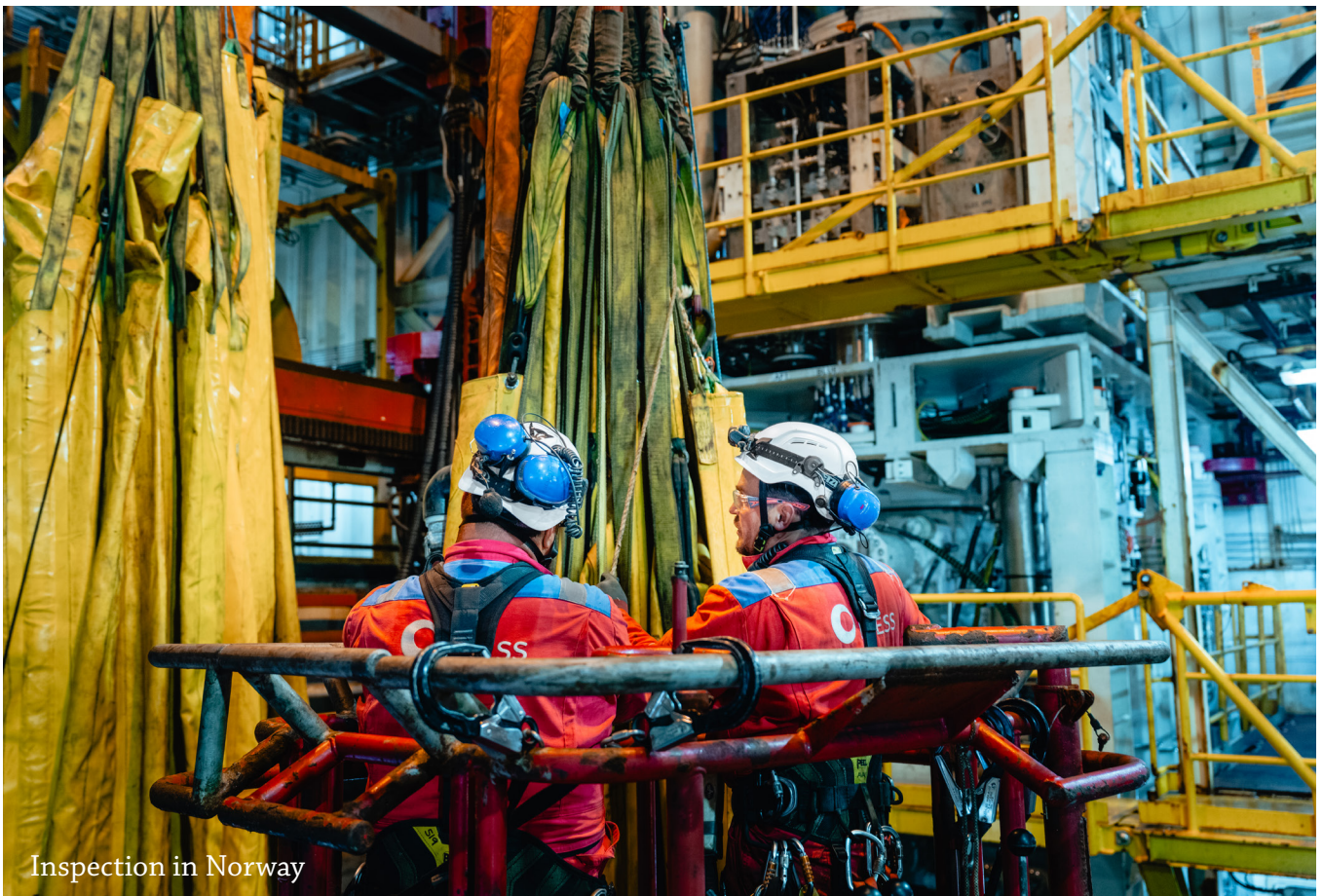
## 6.2 Tracking implementation and results

We track and document implementation through supplier evaluations, audit activities, nonconformity reports, risk management processes, and internal follow-up. Together, these mechanisms enable us to assess whether measures are effective and where further action is needed. The expanded scope and revised methodology introduced in 2025 provide a stronger baseline for monitoring progress over time.

Through this monitoring approach, we identified no confirmed adverse impacts in the 2025 assessments. The assessments did, however, identify elevated risk, incomplete due diligence, and cases where audit findings or supplier follow-up showed that Axess' standards were not fully met. These findings reflected potential risk indicators identified through preventive due diligence rather than confirmed incidents and, in the audit cases, were primarily related to HSE and quality compliance rather than direct human rights or labour rights violations.

Suppliers operating in countries or industries with elevated inherent risk receive enhanced attention through regular evaluation and follow-up. Where no confirmed adverse impact has occurred, our focus remains on preventive and mitigation measures proportionate to the identified risk, as described in Section 6.1.

From 2026, we will strengthen tracking through an expanded set of KPIs for supplier due diligence, to be monitored and presented in our quarterly regional management reviews. Key indicators for due diligence in 2026 are expected to remain linked to supplier approval, supplier commitment, audit completion, and the resolution of identified non-compliance cases across all global entities.



Inspection in Norway

### 6.3 Remediation where appropriate

Where actual adverse impacts are identified, we will assess appropriate remediation or corrective action proportionate to the nature and severity of the incident and to Axess' degree of involvement or contribution, consistent with OECD Guidance. This may include corrective action plans, financial compensation to affected parties, enhanced monitoring, renegotiation of contractual terms, or public statements acknowledging the adverse impact where appropriate.

### 6.4 Communicating follow-up and further work

In 2025, we strengthened our due diligence process through supplier dialogue, audits, supplier scorecards, and internal gap analysis. This work also highlighted the need for stronger internal governance, clearer ownership across relevant functions, and better integration of responsible business practices into procurement and management decision-making.

From 2026, we will further strengthen our work through the introduction of a Supply Chain Management Standard to improve governance and guide our collective approach to ensuring responsible supply chains across the Group. The following priorities also guide our next phase of work:

- **Close implementation gaps:** Across most regions, the main gap remains incomplete due diligence. We need to close the gap with regard to the supplier approval process, audits, and signed supplier commitments. Closing these gaps is the most effective action to reduce overall risk. Any suppliers in high-risk industries, irrespective of their criticality, also warrant particular attention, where audit and evaluation activity must address working conditions, labour rights, and occupational safety in a meaningful way.
- **Strengthen focus on human rights and labour conditions:** We will continue strengthening how supplier dialogue, audits, and evaluations address human rights and decent working conditions more consistently across the Group, with the introduction of a Human Rights Roadmap as a broader initiative to strengthen our approach.
- **Use KPIs to drive accountability:** We will use a quarterly KPI to track the closure of supply chain due diligence gaps, and we will introduce a new Supply Chain Management Standard at the Group level to drive compliance and consistency across all global entities.

# SIGNATURES

This report fulfils Axess Group's disclosure obligation under the Norwegian Transparency Act for the 2025 reporting year. It was approved by the Board of Directors and the Chief Executive Officer of Axess Group on 17 June 2026.



Børge Gjeldvik (Jun 30, 2026 14:46:09 GMT+2)

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Børge Gjeldvik  
Chairman of the Board



Gunnar Gjeldvik (Jun 30, 2026 18:22:22 GMT+2)

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Gunnar Gjeldvik  
Member of the Board



Cathrine Marti (Jun 30, 2026 21:52:40 GMT+2)

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Cathrine Marti  
Member of the Board



Alexander Jensen (Jul 1, 2026 12:12:46 GMT+2)


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Alexander Jensen  
Member of the Board




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Charlotte Kristiansen  
Member of the Board




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Lasse Iversen  
CEO, Axess Group

# APPENDIX

## A. List of companies owned by Axess AS

This appendix lists the companies within Axess AS and its global subsidiaries, together with their associated regions. Unless otherwise stated, entities in which Axess holds less than 50% ownership are not covered by this report.

Companies	Ownership (%)	Operating Country	Operating Region
Axess AS	Parent company	Norway	-
Axess International AS	100%	Norway	-
Axess Technologies AS	100%	Norway	Technologies
Axess Services AS	100%	Norway	Technologies
Axess Connect AS	100%	Norway	Technologies
JKL Holding AS	75%**	Norway	Technologies
Altum Sp Z.o.o	100%**	Poland	Technologies
Axess Asset Integrity AS	100%	Norway	Europe
Axpeak AS	100%	Norway	Europe
Axess Inspection AS	100%	Norway	Europe
Axess Industries AS	100%	Norway	Europe
Axess Warehouse AS	100%	Norway	Europe
Axel Solutions AS	50%	Norway	-
Axess Digital AS	100%	Norway	-
Axess Digital D.o.o	100%*	Bosnia and Herzegovina	-
Axbit AS	59%**	Norway	-
Axbit Poland Z.o.o	59%**	Poland	-
Axess Offshore Norway AS	100%*	-	-
Axess North Sea Holding Ltd	100%*	-	-
Axess North Sea Ltd	100%*	UK	Europe
Axess Ingenieria Las Palmas SL	100%*	Spain	Europe
Axess Germany GmbH	100%*	Germany	Europe
Axess Poland Z.o.o.	100%*	Poland	Europe
Axess do Brasil Ltda	92%*	Brazil	Americas
Axess North America Inc	100%*	USA	Americas
Axess Offshore Wind Inc	100%*	USA	Americas
Axess Baffin Inc	100%*	Canada	Americas
Axess Operations de Mexico S de RL de CV	100%*	Mexico	Americas

<b>Companies</b>	<b>Ownership (%)</b>	<b>Operating Country</b>	<b>Operating Region</b>
Axess Guyana Inc	100%*	Guyana	Americas
Axess Offshore Africa Pty Ltd	100%*	South Africa	Africa
Axess Offshore Inspection Ghana Ltd	100%*	Ghana	Africa
Axess Petrorig Ghana Ltd	60%*	Ghana	Africa
Axess Africa International LLC FZ	100%*	UAE	Africa
Axess Offshore France SAS	100%*	Congo	Africa
Axess Offshore Congo Branch	100%*	Congo	Africa
Axess Offshore Angola (SU) LDA	100%*	Angola	Africa
Axess Offshore Namibia	100%*	Namibia	Africa
Axess Senegal SASU	100%*	Senegal	Africa
Axess Offshore Pte Ltd	100%*	Singapore	APME
Axess Offshore Services Pte Ltd	100%*	Singapore	APME
Axess Offshore Pte Ltd Korea Branch	100%*	Korea	APME
Axess Offshore Pte Ltd Taiwan Branch	100%*	Taiwan	APME
Axess Offshore Australia Pty Ltd	100%*	Australia	APME
Axess Offshore Middle East DMCC	100%*	UAE	APME
Axess AIM India Private Ltd	100%*	India	APME
Praxis Consolidated Services(I) Pvt Ltd	100%*	India	APME
Axess for Oil Services	100%*	Saudi Arabia	APME
Axess Malaysia Sdn. Bhd.	100%*	Malaysia	APME
Axess Oil And Gas Inspection And Maintenance	100%*	Qatar	APME

\* Ownership is through Axess International AS or other fully owned Axess' subsidiary in this list.

\*\* Entities over which Axess has no direct management control.

## B. Glossary

- **Adverse impacts:** Negative effects on fundamental human rights, decent working conditions, or related responsible business areas.
- **Composite risk score:** The combined assessment of inherent risk and residual risk, scored on a scale from 0 to 18 and used in this report to classify suppliers into low-, medium-, high-, and very high-risk bands.
- **Corruption Perceptions Index (CPI):** A country-level index published annually by Transparency International that measures the perceived level of public sector corruption. Used in this report as one of country risk indicators in the inherent risk assessment.
- **Criticality level (1–3):** Internal rating of a supplier's business dependency and operational importance. Criticality 1 is the highest level, assigned to suppliers that are most important to our operations, and these suppliers are prioritised for stronger follow-up across our due diligence processes, including audits and supplier commitment engagement.
- **DFØ High Risk List:** The high-risk sector and product list published by the Norwegian Agency for Public and Financial Management. The list includes both high-risk and very high-risk categories. For Axess Group, the relevant categories are metal, IT, electronics, and textile products.
- **Due diligence:** The process used to identify, assess, prevent, mitigate, track, and follow up risks and adverse impacts. This includes supplier registration, approval, signed supplier commitment, criticality classification, and audits.
- **Human Rights Index (HRI):** A country-level index published by Our World in Data that measures the extent to which human rights are protected in a given country. Used in this report as one of country risk indicators in the inherent risk assessment.
- **Inherent risk:** The supplier's underlying risk profile based on country context and the type of products or services provided.
- **Mitigation gap:** A missing or incomplete due diligence measure that leaves risk insufficiently addressed, such as incomplete supplier approval, missing supplier commitment, or overdue audit follow-up.
- **Nonconformity:** In this report, nonconformity refers specifically to findings relevant to human rights and labour conditions, including where audits or supplier follow-up indicate that these standards are not fully met.
- **One-off supplier:** A supplier engaged for a single or time-limited purpose rather than as part of an ongoing procurement relationship.
- **Residual risk:** The risk that remains based on gaps in Axess' due diligence measures (e.g., missing audit, missing signed supplier commitment, incomplete registration or approval process).
- **Supplier commitment:** Axess' formal supplier declaration confirming alignment with key governing documents and responsible business expectations.

**Axess AS**

Grandfjæra 22C  
6415 Molde, Norway  
+47 982 43 600  
post@axessgroup.com

[Contact us](#)