

Transparency Act Report

2026

Innhold

Transparency Act Report	1
Statement of the Group under the Transparency Act – 2026	1
About us.....	2
Introduction	2
Code of conduct.....	5
Supplier Code of Conduct	6
Expectations to Business Partners	6
Roles and Responsibilities.....	8
Whistleblower channel.....	9

Statement of the Group under the Transparency Act – 2026

The Norwegian Transparency Act aims to promote companies' respect for fundamental human rights and decent working conditions, while ensuring public access to information.

In today's dynamic and rapidly evolving environment, businesses are increasingly embracing responsible practices that support long-term profitability while contributing positively to society and the environment.

In compliance with the Norwegian Transparency Act, we are committed to providing clear, accurate, and timely information regarding our operations. This ensures alignment with regulatory requirements while further reinforcing our dedication to transparency and responsible business conduct.

In conclusion, Maritime Montering's commitment to continuous improvement, transparency, and strong leadership forms the foundation of our sustainability strategy. We firmly believe that these principles not only ensure compliance with the Norwegian Transparency Act, but also drive sustainable growth, strengthen stakeholder trust, and contribute to a more sustainable future.

However, transparency alone is not sufficient. It must be supported by strong and effective leadership that translates commitment into tangible results. Maritime Montering's leadership team (Group) plays a central role in fostering a culture of transparency and accountability throughout the organization. By embedding these principles into our decision-making processes, we provide greater visibility into our sustainability journey while reinforcing a culture of responsibility.

About us

At Maritime Montering we strive to accomplish sustainability management.

Maritime Montering was established in 1981 and is headquartered in Dalsfjorden, Norway. The company specializes in ship interior outfitting, with a strong focus on quality and sustainable interior solutions. We work closely with shipyards and shipowners in a global market and provide interior solutions for a wide range of vessels, including yachts, offshore vessels, fishing vessels, and expedition cruise ships. As a full-service supplier, we deliver newbuilds, refurbishments, and modernization of all interior areas on board vessels.

The group of which Maritime Montering is a part is one of Europe's leading interior outfitting companies within its niche. We have offices across Europe and Asia, and our 700+ employees are dedicated to serving our customers.

For more detailed information about the group's operations, organization, markets, and the products and services we offer, please refer to other sections of our website:

www.maritimemontering.com

Introduction

This statement has been published in accordance with the requirements of the Norwegian Transparency Act. The document covers the full operations of the Maritime Montering Group, including the Norwegian subsidiaries Maritime Montering Norway, and our companies Maritime Montering Poland, Maritime Montering Furniture, Maritime Montering Turkey, Maritime Montering China, Maritime Montering India, Maritime Montering Romania and MMD. It sets out the steps taken by the Maritime Montering Group to continue the work to assess, prevent, and mitigate the risks of breaching fundamental human rights and decent working conditions in its own operations, supply chain and business partner and supply chains.

At Maritime Montering, we view transparency and strong leadership not as one-time achievements, but as continuous commitments. The essence of sustainability lies in ongoing improvement, which is integrated into our business model. We acknowledge that this is an evolving journey that requires continuous learning, adaptation, and dedication. We remain committed to regularly reviewing and enhancing our sustainability practices to meet the changing expectations of stakeholders, business partners, subcontractors and customers, as well as the needs of society and the environment.

OUR VALUES

WE DO WHAT IS RIGHT

We act with integrity in all situations, even when it is difficult or inconvenient. Our decisions are guided by safety, quality, fairness, and long-term responsibility toward our colleagues, customers, and partners.

WE ARE ALL ACCOUNTABLE

Each of us takes ownership of our responsibilities and outcomes. We keep our commitments, speak up when something is off track, and take responsibility for correcting mistakes rather than placing blame.

WE LEARN AND IMPROVE EVERY DAY

We continuously seek better ways of working by learning from experience, feedback, and each other. Small improvements, shared openly across the organization, make us stronger and more competitive over time.

WE HELP EACH OTHER TO SUCCEED

We work as one team across functions, sites, and countries. By supporting one another, sharing knowledge, and respecting different perspectives, we ensure collective success and build a robust and solid organization.

Maritime Montering Group is the provision of structure, function leadership and support to all of Maritime Montering`s companies. The Group offers a broad portfolio of innovative, high-quality solutions across the following categories:

- Installation services onboard
- Materials and goods to both newbuilds and refit
- ICT
- Consultancy and advisory services

Our products and services are designed to contribute to improving the maritime living and working environment and making memorable experiences for people at sea.

In today`s rapidly changing environment, businesses are increasingly expected to operate responsibly while ensuring long-term profitability. At Maritime Montering, sustainability is an integral part of our strategy and a key driver of our continued success. By proactively addressing environmental, social, and governance (ESG) matters, we demonstrate our commitment to responsible business conduct and meaningful impact.

Transparency and open communication are essential for building trust with our stakeholders. We are therefore committed to providing clear and accurate reporting on our sustainability performance, enabling constructive dialogue and accountability.

We take our responsibility towards people and communities seriously and are committed to safeguarding human rights throughout our value chain. We have established policies and processes to support responsible business practices and continuously work to strengthen these efforts. By integrating sustainability and innovation into our operations, we position ourselves as a leading player in our industry.

Our employees are our most valuable resource. We are committed to respecting their rights, supporting their development, and adhering to the principles set out in the UN Universal Declaration of Human Rights and the International Labour Organization (ILO) standards. We promote equal opportunities and reject discrimination in any form, fostering a diverse, inclusive, and supportive work environment.

Maritime Montering aims to create long-term value by investing in employee development, recognizing this as both a moral responsibility and a strategic advantage.

We also work closely with responsible suppliers who share our commitment to sustainability, enabling positive impact throughout the supply chain.

At the core of our ESG approach is active engagement with stakeholders and a strong focus on understanding their expectations. Stakeholder dialogue and materiality assessments are therefore integral to our strategy.

We prioritize engagement with six key stakeholder groups:

- **Customers** – Delivering sustainable, high-quality products and services while ensuring transparency in our ESG practices
- **Suppliers** – Collaborating with responsible partners to strengthen sustainability performance across the supply chain
- **Employees** – Fostering a supportive and inclusive work environment that promotes growth, development, and ESG integration
- **Investors** – Maintaining transparent communication on ESG performance and aligning with long-term investment expectations
- **Regulators** – Ensuring compliance and supporting policies that promote sustainable business practices
- **NGOs** – Leveraging external expertise and insights to strengthen and develop our sustainability initiatives

A safe and healthy working environment is a key priority in Maritime Montering's strategy, and the group has a clear objective to ensure a sustainable and responsible supply chain. Stakeholders may submit reports or concerns directly to the company's main email account. This helps foster an open communication culture and ensures that any irregularities are addressed.

Maritime Montering operates in several countries and collaborates with a large number of suppliers. We continuously work to ensure that our policies and procedures safeguard fundamental human rights and responsible working conditions in connection with the production of goods and the delivery of services.

Our objective is to establish a continuous cycle of improvement in sustainability performance, driven by transparency and strong leadership. Through systematic monitoring and evaluation of our sustainability metrics, we identify areas for improvement and implement targeted initiatives to strengthen our performance. This dynamic approach enables us to make measurable progress and supports our ambition to remain a leader in sustainable industry practices.

Code of conduct

Clear requirements and consistent business conduct foster trust and loyalty among employees, business partners, customers, and the communities in which we operate.

Our Code of Conduct applies to all permanent and temporary employees of Maritime Montering, as well as hired personnel, consultants, and any other individuals authorized to act on our behalf, regardless of location.

In addition, the Code applies to members of the Board of Directors and Executive Advisors (collectively referred to as "Maritime Montering personnel"). All personnel are individually responsible for committing to and complying with our Code of Conduct and associated guidelines.

Leaders and managers across Maritime Montering, irrespective of country or location, are responsible for setting the appropriate tone at the top and fostering a strong culture of ethics and compliance. They are expected to:

- Act as role models for ethical behavior
- Support and guide employees in adhering to the Code and underlying policies
- Monitor compliance and identify potential violations
- Assess and mitigate compliance risks
- Promote a culture where concerns can be raised in good faith without fear of retaliation

Supplier Code of Conduct

Our Supplier Code of Conduct sets out the expectations we have of our business relationships, including suppliers and partners. Maritime Montering is committed to promoting corporate responsibility and sustainability throughout our supply chain, and we work closely with our suppliers and partners to achieve this objective.

The Code defines key ethical principles and requirements addressing issues that, if improperly managed, may have significant legal, business, and reputational consequences. When selecting new business partners, we place particular emphasis on social, environmental, and ethical standards.

The Supplier Code of Conduct covers, among other areas:

- **Legal and Regulatory Compliance**
- **Business Ethics**
- **Human Rights and Labour Practices**
- **Health and Safety**
- **Environmental Stewardship**
- **Monitoring and Compliance**
- **Reporting Concerns**

The Code applies to all business partners, including contractors, agents, and consultants, who are contractually obligated to comply with it. This includes their employees at all levels, board members, hired personnel, consultants, and others acting on their behalf.

Expectations to Business Partners

Maritime Montering expects its business partners to make their best efforts to ensure that equivalent standards are upheld throughout their own operations and supply chains, particularly among their own suppliers.

All business partners must ensure that goods and services delivered to Maritime Montering are produced in compliance with applicable laws, regulations, and this Code of Conduct. Furthermore, they are required to:

- Communicate the Code to their subcontractors
- Monitor and ensure effective implementation

Business partners must be able to document compliance upon request from Maritime Montering. Such documentation may include:

- Self-declarations
- Follow-up meetings
- Due diligence performed by external service providers
- Inspections of working conditions at production sites

Maritime Montering reserves the right to determine the appropriate form of verification. Suppliers are also required to identify and provide contact details of any sub-suppliers that Maritime Montering may wish to assess or audit.

Clear requirements and consistent business conduct build trust and loyalty among employees, business partners, customers and communities. Our Code applies to all permanent and temporary employees of Maritime Montering as well as hired personnel, consultants and any other party who have authority to act on our behalf regardless of location.

In addition, the Code also applies to all members of our Board of Directors and Executive Advisors (collectively referred to as “Maritime Montering personnel”). All personnel are each accountable for making a personal commitment to follow our Code through our guideline and code of conduct. All leaders and managers within Maritime Montering, regardless of country or location, are responsible for setting the right tone at the top to cultivate a strong corporate culture for ethics and compliance. They are expected to act as role models for ethical conduct, educate and support employees in complying with the Code and underlying policies, perform oversight to detect violations, identify and mitigate compliance risks, and finally yet importantly, promote a culture of speaking up in good faith without fear for retaliation.

Our Supplier Code of Conduct sets out expectations to our business relations, including business partners and suppliers. At Maritime Montering we promote corporate responsibility and sustainability also in our supply chains. We cooperate closely with our suppliers and business partners in pursuit of this aim. The code outlines our key ethical principles and requirements on issues that can have significant business, legal and reputational consequences if handled improperly. When selecting new business relations, emphasis will be given to social, environmental and integrity standards. This Code covers human rights, workers’ rights, children’s rights, the environment and corruption. The Supplier Code of Conduct applies to business relations – including contractors, agents and consultants – who have a contractual obligation to comply with it. This includes their employees at all levels, board members, hired personnel, consultants and others who act on behalf of or represent the business relation.

Maritime Montering further expects its business relations to use their best efforts towards ensuring that equivalent standards are complied with and respected within their own sphere of influence, in particular by their own suppliers. Business relations to the Maritime Montering Group are to supply goods and services that are produced in compliance with applicable laws, regulations and this Code. Moreover, they are to communicate the Code to their sub-contractors, and to monitor implementation. They must be able to document compliance with the Code at Maritime Montering’s request. Such documentation may take the form of self declaration, follow-up meetings, due diligence by external service provider and/or inspections of the working conditions at production sites in the sole discretion of Maritime Montering. The supplier will be obliged to name and provide contact information of any sub-supplier that Maritime Montering wishes to inspect.

Roles and Responsibilities

We promote responsible procurement practices by ensuring that our suppliers adhere to high ethical standards and respect human rights and labour conditions. Through our strong commitment to supply chain transparency, as well as worker health and safety, we aim to establish a sustainable and ethical foundation for our products and services.

The Group has a centralized procurement function that supports its subsidiaries in procurement-related activities.

Maritime Montering Group is committed to building strong and long-term partnerships with suppliers based on fair and transparent business practices, in full compliance with applicable procurement laws and regulations, and aligned with the highest international ethical standards.

We expect our suppliers to actively consider environmental, social, and governance (ESG) factors in line with internationally recognized standards, including the UN Global Compact. Our supplier self-assessment process is designed to provide valuable insights into suppliers' quality systems, ESG performance, and environmental initiatives, enabling us to strengthen collaboration and drive continuous improvement across the value chain.

Due Diligence Assessments

To identify risks related to responsible working conditions and respect for human rights, we conduct due diligence assessments based on the group's procurement categories. These assessments are carried out in accordance with the OECD Guidelines and involve relevant internal resources.

Based on our risk assessments and relevant risk factors, the categories **Installation Services** and **Materials/Goods** are considered to present the highest level of severity and likelihood of breaches of responsible working conditions and fundamental human rights.

Based on the due diligence conducted, the group's operations are assessed to involve a risk of adverse impacts on decent working conditions and fundamental human rights.

Supplier Base and Risk

The supplier base reflects the breadth of the group's operations, and we acknowledge that certain areas carry inherent risk. These risks must be managed through responsible procurement practices.

No breaches or adverse impacts were identified in the group's operations or supply chain in 2025.

Measures and Priorities for 2026

Maritime Montering is implementing clear procurement criteria to strengthen awareness of our responsibilities as both a responsible employer and a responsible purchaser. As part of our compliance efforts, we have adapted internal requirements, processes, and templates.

Going forward, we will continue to focus on professionalizing the procurement process through:

- Standardization of minimum supplier requirements
- A strengthened category-based approach
- Clear definition of requirements for different procurement categories

These initiatives aim to ensure responsible working conditions and safeguard fundamental human rights throughout both our operations and supply chain.

Whistleblower channel

Employees have the right to report concerns regarding misconduct in the employer's operations, cf. the Norwegian Working Environment Act Section 2 A-1.

To facilitate responsible whistleblowing and ensure a sound working environment, we have established internal whistleblowing procedures in our internal Maritime Montering Guideline.

Maritime Montering promotes an open and transparent communication culture. Illegal or unethical conduct may negatively impact the working environment and must therefore be addressed and handled appropriately.

A fundamental principle is that reporting should be carried out in a responsible manner. These guidelines aim to facilitate whistleblowing and provide clarity on what constitutes an appropriate procedure.

The procedures have been discussed with employee representatives (and safety representatives) in accordance with the Working Environment Act Section 2 A-6.

Maritime Montering has established an Whistleblower email:

Whistleblower@maritimemontering.com

- ➔ The whistleblower email is open for both internal and external use to contact us through our homepage.

At Maritime Montering we foster an open-door policy and encourage employees to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's line manager is in the best position to address an area of concern. If this reporting channel is deemed inappropriate due to the individual's involvement or the severity of the breach in question, the breach should be reported to our external Legal, HR Group or directly to the CEO, or alternatively, to the Chairman of the Board.