



Transparency Act Statement

2026

DOCUMENT OWNER	CEO of Grieg Maritime Group
APPROVED BY	Grieg Maritime Group's Board of Directors
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About this statement

The Norwegian Transparency Act aims to promote enterprises' respect for fundamental human rights and decent working conditions and ensure public access to information.

This document outlines the information requirements under the Norwegian Transparency Act (Åpenhetsloven) and should be read in conjunction with the [Grieg Maritime Group Annual Report 2025](#).

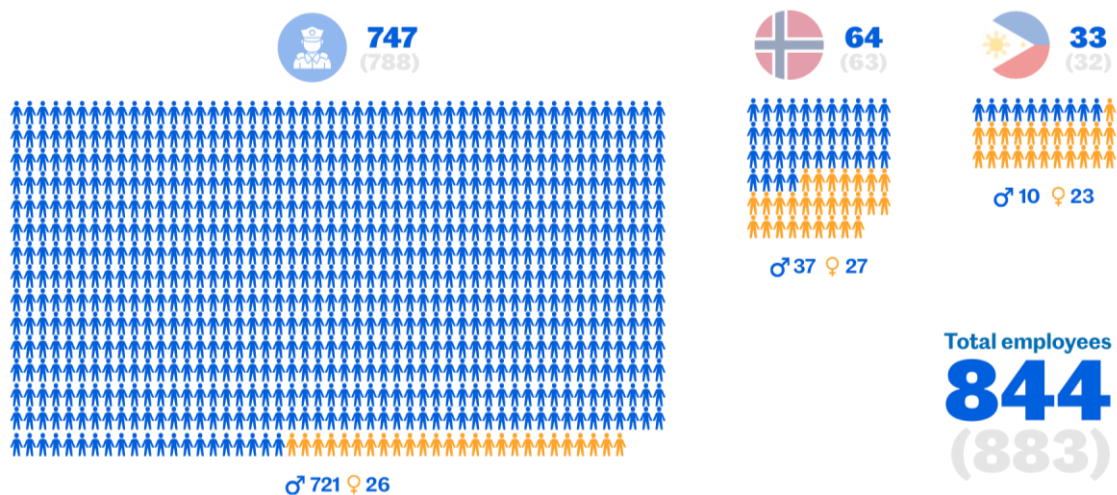
The annual report covers the Group's own operations, as well as upstream and downstream value chains, for the 2025 financial year, and applies to Grieg Maritime Group and its subsidiaries ([page 8](#) of the annual report), and includes:

- An overview of the Group's organisation and areas of operations;
- Guidelines and procedures for handling actual and potential adverse impacts on human rights and decent working conditions;
- Information of actual or potential negative impacts on human or labour rights that the Group has identified through its due diligence; and
- Actions or measures the Group has taken or plans to take to stop actual negative impacts or mitigate potential impacts on human or labour rights, and the results or expected outcomes of these.

Our organisation and areas of operation

Grieg Maritime Group is part of the Grieg Group and builds on more than 140 years of maritime experience. Its core activities include ship owning and operations within Open Hatch shipping, combined with investments in short sea shipping and energy transition activities.

At the end of 2025 our own workforce consisted of:



The Group's operations span:



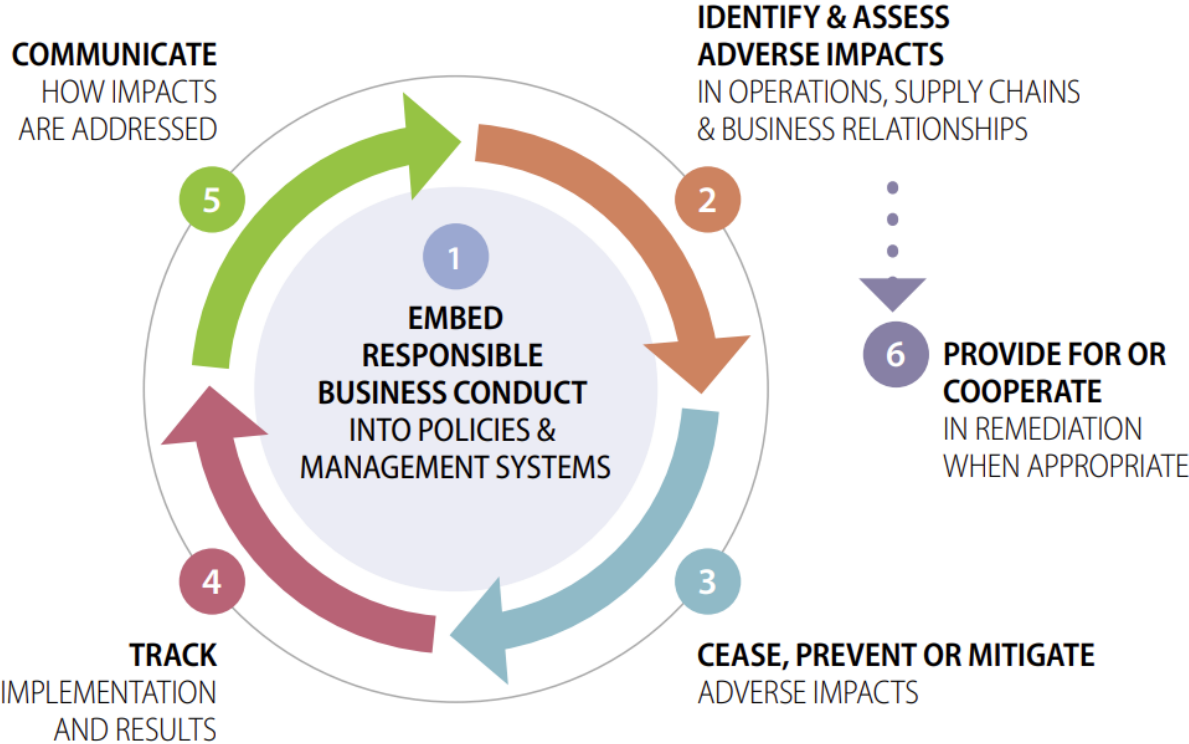
These activities create exposure to human rights risks across both own workforce and the value chain.

Further information on our areas of operation can be found on [page 16](#) of the annual report.

Guidelines and procedures for handling actual or potential negative impacts on human and labour rights.

Grieg Maritime Group's human rights approach follows the six-step due diligence process aligned with [OECD Due Diligence Guidance for Responsible Business Conduct](#):

Figure 1 [The OECD Guidelines Due Diligence Process](#)



- **Policy foundation (step 1):** Grieg Maritime Group's *Human Rights policy* states our commitment to respect internationally recognised human and labour rights. The policy is interlinked with our *Ethical guidelines*, which outline the principles to which employees and the Group must adhere to conduct responsible business, and our *Supplier Code of Conduct*, which outlines the expectations for the Group's suppliers and is based on UN Global Compact Principles.

- **Implementation (steps 2, 3, 4):** The Group has the following supporting documents that help us assess, identify and manage risks: Our *Third-party screening procedure*, which provides a framework for better understanding our counterparties, identifying, recording and handling findings, and our *Human rights impact assessment (HRIA) guidelines*. Further details can be found on page 53 of our [annual report](#).

- **Transparency (step 5):** Grieg Maritime Group communicates outcomes internally and externally, via the [annual report](#). Information on how impacts are identified can be found on pages 48, 53 and 54. Information on our impacts identified can be found on page 26, and information on how these impacts are addressed can be found in the section Own workforce, from page 48 to page 52 and under the section Workers in the value chain, on pages 54 and 55. In addition, anyone may request information about our human rights approach under the Transparency Act via transparency@griegmaritime.com.

- **Remediation (step 6):** The Group provides for or cooperates in remediation where adverse impacts are identified, as outlined in our *Remediation guidelines*. Additional information on our approach to remedy can be found on page 53 of the [annual report](#).

Information regarding actual and potential negative impacts on human or labour rights that the Group has identified through its due diligence

As part of our 2025 double materiality assessment (DMA), we identified actual and potential impacts on people and the environment. Further details on this process can be found on page 24 of the [annual report](#).

Impacts on Own workforce

Based on development dialogues and internal surveys, we have mapped out the potential and actual negative impacts on our sea- and shore-based employees. Through this engagement, we have identified impacts particularly concerning sea-based employees, who inherently face greater health and safety challenges than their land-based counterparts. The material impacts identified in the 2025 DMA are detailed on [page 26](#) of the annual report and include:

- Health and safety: Seafarers are exposed to demanding work conditions involving heavy machinery and toxic substances. Delayed crew changes add stress and anxiety, affecting personal lives and potentially contributing to fatigue onboard. There were zero fatalities among our own workforce in 2025 and 11 recordable injuries (down from 18 in 2024), with a Lost Time Injury Frequency of 0.57 (down from 0.71 in 2024).
- Training and skills development: Due to developments in the maritime industry and the Group's newbuild programme, inadequate training on new cargo types, ships, or fuels could put the safety of the crew at risk and lead to more accidents, resulting in damage to cargo or the vessel and potentially increasing legal liabilities that could impact insurance prices in the future.

- Harassment and bullying: In the internal SheWorthy Survey (2025), a survey directed to our female seafarers employees, 47% of female seafarers reported having experienced bullying or harassment either onboard or onshore. The annual Anti-Harassment and Bullying Survey (October 2025) identified 14 individuals who reported cases; of these, 5 considered their issue resolved to their satisfaction, while the remaining 9 expressed dissatisfaction with the remedy.
- Diversity: The same SheWorthy survey, 13 out of 30 female seafarers sailing on the Company's vessels reported experiencing bullying and harassment at work due to their gender. The same survey indicated that having more female representation enhances mental health support.

Impacts on workers in the value chain

To map the impacts within our supply chain, we have relied on internal knowledge as well as consulted credible external resources, such as reports from non-governmental organisations and universities.

Workers within the Group's value chain include those involved in both upstream and downstream operations. In our downstream activities, stevedores are susceptible to health and safety incidents, working with potentially dangerous machinery and often at heights. No fatalities involving stevedores were reported during 2025 (compared to one fatality in 2024). Similarly, yard workers engaged in drydocking or new build projects face comparable challenges. We have four new open hatch builds and five short-sea vessels under construction, and there may be risks related to labour rights, including forced labour, particularly regarding the sourcing of steel for new builds. The potential impact of forced labour has received a lower rating in the 2025 DMA following newbuilding yard assessments and planned mitigation actions for upcoming projects. We have not collected any evidence that forced labour occurs.

During 2024, shore workers from a sub-supplier of hold cleaning services boarded one of our vessels to perform hold maintenance. Subsequently, it was discovered that the working conditions did not comply with local legislation, leading authorities to remove the workers from the vessel. Issues cited included an excessive number of people on board, inadequate living arrangements, and extensive working hours. This was reported as a breach committed by the contractor in the country. In 2025, the contractor received infraction notices from the labour authorities and was eventually fined for breaches of labour laws.

Further details can be found on pages 26 and 53–55 of the [annual report](#).

Actions or measures the Group has taken or plans to take to stop actual negative impacts or mitigate potential impacts on human or labour rights, and the results or expected outcomes of these.

Details on how Grieg Maritime Group has addressed these impacts, including actions taken or planned, and the progress achieved, can be found on the following pages of the [annual report](#):

For impacts related to health and safety within our own workforce, actions and progress are detailed on pages 48 and 49. Information on training initiatives is available on pages 49 and 50. Regarding measures to address diversity, bullying, and harassment impacts, relevant details are provided on page 50 and pages 51 to 52, respectively.

Regarding workers in the value chain, actions taken to mitigate or prevent the recurrence of labour breaches, for example, those identified on board our vessels, are detailed on page 55.

Contact

As of May 2026, no severe human rights issues or incidents have been reported within our own operations or throughout our upstream and downstream value chain. If you have any information about unacceptable workplace conditions or know of any human rights violations within our value chain, please note that you can notify us via our third-party whistleblower channel.

Link for internal employees whistleblowing

<https://portal.mittvarsel.no/skjema/grieg-gruppen-intern/S6wpr9yvKhYsHDkL.13403>

Link for external whistleblowing:

<https://portal.mittvarsel.no/skjema/grieg-gruppen-ekstern/LXF2Q6VM9b78UOpk.13404>

Any person has the right to information regarding how the Group addresses actual or potential negative impacts on human and labour rights. Should you have an inquiry on how we work with human rights, you can contact us at transparency@griegmaritime.com. To date, no inquiries or issues have been raised, including in May 2026.

Bergen, 18th of June 2026.

Camilla Grieg
Chair

Siv Remøy-Vangen

Didrik Munch

Hege Leirfall Ingebrigtsen

Paal Espen Johnsen

Stian Grieg Sæthre

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