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1. Introduction

Hydrafit is not currently directly covered by the Norwegian Transparency Act (Åpenhetsloven) based on the company's size and the thresholds set out in the Act.

The company has nonetheless chosen to work systematically in accordance with the principles of the Transparency Act and carries out due diligence assessments related to human rights and decent working conditions in its own operations and supply chain.

This statement outlines how Hydrafit works with responsible business practice in accordance with section 5 of the Act.

2. Anchoring in the organisation

The work on human rights and decent working conditions is anchored in the company's management and forms part of the company's management system.

The company is ISO-certified in:

- ISO 9001 (Quality)
- ISO 14001 (Environment)
- ISO 45001 (Working environment)

The Managing Director is responsible for the implementation and follow-up of this work, with support from the company's HSEQ function and the person responsible for procurement.

The work is integrated into:

- Code of Conduct
- Supplier Integrity Guidelines
- Procurement procedure
- Supplier evaluation procedure

These documents apply to the entire organisation.

3. Guidelines and management system

3.1. Code of Conduct

The company's Code of Conduct sets out requirements for:

- Respect for human rights
- Prohibition of child labour and forced labour
- Non-discrimination

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- Decent working conditions
- Anti-corruption
- Whistle-blowing and protection against retaliation

The guidelines apply to all employees and relevant external business partners.

3.2. Requirements for suppliers

The company sets requirements for suppliers through:

- Classification of suppliers
- Supplier Questionnaire
- Supplier Integrity Guidelines

Suppliers must confirm that they:

- Comply with applicable legislation
- Respect human rights
- Do not use child labour or forced labour
- Meet health, environment and safety requirements
- Adhere to anti-corruption principles

Where deficiencies are identified, dialogue is initiated and corrective actions are required.

4. Mapping and risk assessment (Due Diligence)

Hydrafit carries out due diligence assessments as part of supplier approval and follow-up.

This includes:

- Classification of suppliers based on size, region, type of delivery and risk factors
- Assessment of whether the supplier is covered by the Transparency Act
- Review of publicly available statements where these exist
- Collection of documentation and self-declarations
- Registration and follow-up in the company's quality system

Approved suppliers are registered in the company's ERP and quality system, and certificates and documentation are monitored with alerts upon expiry.

Where risk or non-conformance is identified:

- Dialogue with the supplier is initiated
- Corrective measures are required

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- Continuation of the relationship is assessed in the event of insufficient improvement

5. Actual and potential adverse impacts

At the time of this statement, Hydrafit has not identified actual serious breaches of human rights or decent working conditions in its own operations.

Risk is primarily assessed as being linked to:

- Supply chains outside the Nordic countries
- Production in countries with elevated risk
- Lower tiers of the supply chain

These areas are prioritised in further follow-up.

6. Measures to mitigate risk

To reduce risk, the company works systematically with:

- Structured supplier approval
- Requirements for documentation and certification
- Dialogue-based improvement work
- Integration of requirements into contracts
- Whistleblowing channel for employees and external parties

The company uses a digital quality system for the registration, documentation and follow-up of suppliers and non-conformances.

7. Whistleblowing and contact point

Employees and external parties may report concerns related to human rights, working conditions or other reprehensible matters.

Reports may be submitted via:

- Immediate manager
- The company's whistle-blowing function in the quality system (the reporter chooses whether to remain anonymous or to be identified by name)
- E-mail to: post@Hydrafit.no

The company does not tolerate retaliation against persons who report in good faith.

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8. Right to information under the Transparency Act

Even though Hydrafit is not directly covered by the Transparency Act, the company will respond to enquiries about how the business handles actual and potential adverse impacts related to human rights and decent working conditions.

Enquiries may be directed to:

E-mail: post@Hydrafit.no

9. Ongoing work

The work on due diligence assessments is a continuous process.

The company will annually review and further develop its procedures in step with:

- Changes in the risk landscape
- Growth in the business
- Changes in regulations

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