



GENERAL OCEANS

REPORT UNDER THE TRANSPARENCY ACT 2022

For the year ended 31 December 2022

TABLE OF CONTENTS

About General Oceans	3
OECD Due-Diligence Process	3
General Oceans’ Guidelines And Procedures On Human Rights And Decent Working Conditions	4
SUPPLIER CODE OF CONDUCT.....	4
OUR APPROACH TO ESG	5
WORKING ENVIRONMENT	5
ANTI-CORRUPTION POLICY	6
Overview Of The Supplychain	6
Goals And Plans	7
Supply Chain Risk Assessment And Due Diligence Evaluation	8
ACTUAL ADVERSE IMPACTS IDENTIFIED.....	9
MEASURES TO CEASE OR MITIGATE SIGNIFICANT RISKS OF ADVERSE IMPACTS.....	9
TRACK IMPLEMENTATION AND RESULTS	9
COMMUNICATE HOW IMPACTS ARE ADDRESSED.....	9
PROVIDE FOR OR COOPERATE IN REMEDIATION WHEN APPROPRIATE.....	10
Signature Page By The Board Of Directors	11

ABOUT GENERAL OCEANS

General Oceans AS (“General Oceans”, the “Company”) and its subsidiaries (together referred to as the “Group”) is a developer and manufacturer of oceanographic sensors and underwater robotic vehicles and manipulators. Our companies all have a successful and profitable track record that enables a strong focus on continuous technology development and independent operation.

Our goal is to provide the ocean community with safe and sustainable ways to meet the operational, scientific, and defence challenges that comes with increased activity in the world’s ocean. We will meet our goal by leveraging the combined business acumen of the Group and our joint understanding of sensor technologies, robotics, and AI to bring pioneering solutions to market. The Group actively seeks collaboration with existing institutions and companies but is also structured to enable rapid funding and execution of greenfield projects as required to quickly respond to new challenges.

This Transparency Act Report covers the following major groups / operating companies:

Name	Business office
General Oceans AS	Norway
General Oceans Ltd	United Kingdom
Nortek AS (Group)	Norway
Strategic Robotic Systems Inc	USA
Reach Robotics Pty Ltd	Australia
Tritech International Ltd	United Kingdom

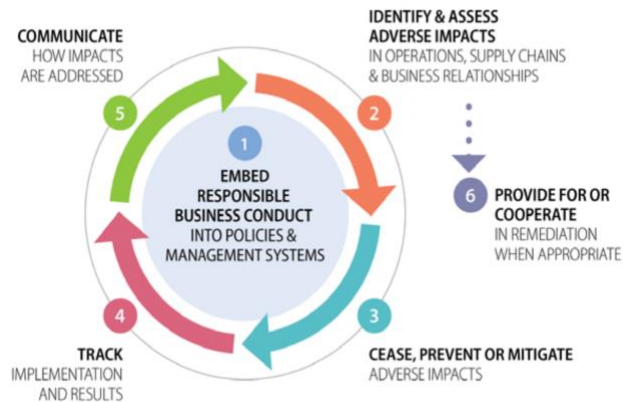
OECD DUE-DILIGENCE PROCESS

The Transparency Act (the “Act”) relating to enterprises' transparency and work on fundamental human rights and decent working conditions entered into force 1 July 2022 in Norway. The Act shall promote enterprises’ respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

The Act applies to larger enterprises that are resident in Norway and that offer goods and services in or outside Norway. General Oceans falls under the category “larger enterprises” by definitions of the Act.

Under the Act:

1. General Oceans shall carry out due diligence in accordance with the OECD Guidelines for Multinational Enterprises regularly as illustrated in the diagram below.



2. General Oceans shall account for the due diligence by publishing a report on the company's website by 30 June 2023.
3. General Oceans shall give information regarding how General Oceans addresses actual and potential adverse impacts identified in the due diligence upon a written request to inquiry@generaloceans.com

GENERAL OCEANS' GUIDELINES AND PROCEDURES ON HUMAN RIGHTS AND DECENT WORKING CONDITIONS

SUPPLIER CODE OF CONDUCT

General Oceans has a group-wide Supplier Code of Conduct to be complied by all operating companies. These guidelines set out the expected approaches for doing business with our suppliers and business partners.

The Supplier Code of Conduct at General Oceans outlines the principles that suppliers, sub-suppliers, and their respective employees and consultants must comply with. These guidelines are based on UN declarations, ILO conventions, UN Global Compact's principles, and the OECD Anti-Bribery Convention, aiming to promote respect, dignity, safety, environmental responsibility, and ethical operations.

The Supplier Code of Conduct covers various aspects, including adherence to laws and regulations, labour rights, working conditions, rejection of child labour and forced labour, freedom of association, anti-corruption, environmental responsibility, and ethical business conduct. Suppliers are required to provide employees with good working conditions, ensure no discrimination, and respect their rights. They are also required to have systems for waste management, recycling, and reducing their carbon footprint. Suppliers are expected to responsibly source materials, avoid using conflict minerals, and disclose relevant information upon request.

The Supplier Code of Conduct applies universally across the supply chain and is integral to any contract between General Oceans and its suppliers. Suppliers are expected to endorse and adhere to this Supplier Code of Conduct and ensure that everyone involved in delivery is aware of and agrees to the Supplier Code of Conduct. Non-compliance is addressed through corrective actions, and continuous failure to comply can result in termination of the business relationship.



OUR APPROACH TO ESG

General Oceans has a vision to lead on sustainability and Environment, Social, and Governance (“ESG”). This means using its scale and holding company status to help transform the ocean technology sector and drive change across the Group. We will put plans in place that will enable the delivery of best practices across all ESG-related programmes and processes. For detailed ESG policies please refer to the Group’s Annual Report 2022.

WORKING ENVIRONMENT

General Oceans seeks to employ a diversified workforce of both sexes and different nationalities as a basis for positive development and sound decision making. General Oceans seeks to create an environment which attracts and retains highly qualified employees and in which employees feel valued for their own contribution to the Group’s performance.

1. Safe and Healthy Environment

The Group is committed to maintaining a safe and healthy working environment for all employees. This includes compliance with all relevant health and safety regulations, regular risk assessments, and provision of necessary safety equipment and training.

2. Respectful and Inclusive Environment

The Group adheres to country laws relating to discrimination for all its territories and actively promotes anti-discrimination in all aspects of the business. The Group is committed to fostering a respectful and inclusive environment, free from discrimination, harassment, and victimization. All employees should feel valued and respected and have equal opportunities regardless of their age, gender, race, ethnicity, religion, disability, or sexual orientation. General Oceans is encouraging equal rights and opportunities amongst its employees and does not tolerate harassment or discrimination in any form.

The Group strives to ensure that work of equal value shall receive equal pay, regardless of social differences. Salaries are determined based on a variety of factors, including, but not limited to, seniority, performance, responsibility, and qualifications. Salary adjustments are carried out once a year. Salary levels vary across jurisdictions depending on competition for such resources and the general wage level of the countries the Group operates in.

3. Work-Life Balance

We believe in the importance of work-life balance and strive to provide flexible working arrangements where possible. This includes considerations for part-time work, flexible hours, remote work, and leave arrangements.

4. Professional Development

The Group provides training, development opportunities, and resources necessary for employees to perform their jobs effectively and enhance their skills. We believe in the continuous learning and growth of our employees. The Group is committed to supporting the professional development of our employees. This includes providing opportunities for training, skills development, and career advancement.

5. Open Communication

The Group encourages open communication and actively seek feedback from our employees. We will provide multiple avenues for employees to voice their concerns, suggestions, and ideas.



GENERAL OCEANS

The Group established clear procedures for employees to raise concerns or grievances without fear of reprisal. All grievances will be taken seriously and handled confidentially.

6. Privacy

We respect the privacy of our employees and will handle personal information in a confidential and secure manner.

ANTI-CORRUPTION POLICY

Corruption stands in the way of economic development, is anti-competitive and undermines both the rule of law and the democratic process. General Oceans' worldwide operations are subject to national and international law, prohibiting General Oceans and its employees from taking part in corruption, such as bribery of public officials or employees in the private sector.

General Oceans has a strong commitment to operate according to ethical and sound business principles and complies with all laws and regulations. General Oceans will not allow or tolerate involvement in any form of corruption.

General Oceans will take any necessary steps to ensure that General Oceans' independent business partners, suppliers, customers, and joint ventures partners, do not take part in corruption or other illegal or unethical activities in connection with its business with General Oceans

For detailed anti-corruption policies please refer to the Group's Annual Report 2022.

OVERVIEW OF THE SUPPLYCHAIN

General Oceans operates a global supply chain that is both complex and diverse. This intricate network spans across multiple continents, including trusted suppliers, and logistics providers.

From the sourcing of raw materials to the manufacturing, assembly, and distribution of our products, each stage of our supply chain is closely managed to ensure the delivery of high-quality products to our customers. We are deeply committed to maintaining transparency, fairness, and sustainability within our supply chain, ensuring that all operations align with the Group's core values and legal obligations. To this end, we carry out regular risk assessments, due diligence checks, and maintain an open and consistent dialogue with all our suppliers.

The Group clearly communicates expectations and standards to its suppliers, including policies on human rights, labour rights, environmental practices, and anti-corruption. Upon engagement, suppliers are required to acknowledge our Supplier Code of Conduct Policy and provide their internal policies, including code of conduct, policies on ESG, policies on working environment, policies on anti-corruptions. Our ongoing efforts are aimed at addressing any issues promptly and continually improving our practices. Our ultimate goal is to create a supply chain that not only drives our business success, but also contributes positively to our communities and the environment.

GOALS AND PLANS

Year	Supply chain or business partner (Turnover > NOK 1 million)	Activities
Year 1 2022	<p>Matured operating company</p> <ul style="list-style-type: none"> • Top 15 material and part suppliers <p>Acquired operating companies</p> <ul style="list-style-type: none"> • Top 5 material and part suppliers 	<p>Matured operating company</p> <ul style="list-style-type: none"> • Perform and include ESG in supplier risk assessment • ESG audits and assessment through available information • Supplier code of conduct • Company transparency <p>Acquired operating companies</p> <ul style="list-style-type: none"> • Incorporation of group-wide supplier policies • Perform supplier risk assessment • Supplier code of conduct
Year 2 2023	<p>Matured operating companies</p> <ul style="list-style-type: none"> • All material and part suppliers and service providers <p>Acquired operating companies</p> <ul style="list-style-type: none"> • Top 15 material and part suppliers 	<p>Matured and acquired operating companies</p> <ul style="list-style-type: none"> • Perform and include ESG in supplier risk assessment • ESG audits and assessment through available information • Supplier code of conduct • Company transparency
Year 3 2024	<p>Matured operating companies</p> <ul style="list-style-type: none"> • Top 15 business partners <p>Acquired operating companies</p> <ul style="list-style-type: none"> • All material and part suppliers and service providers 	<p>Matured operating companies</p> <ul style="list-style-type: none"> • Perform and include ESG in business partner risk assessment • ESG audits and assessment through available information • Business partner code of conduct <p>Acquired operating companies</p> <ul style="list-style-type: none"> • Perform and include ESG in supplier risk assessment • ESG audits and assessment through available information



		<ul style="list-style-type: none"> • Supplier code of conduct • Company transparency
Year 4 2025	All operating companies	<ul style="list-style-type: none"> • Perform and include ESG in business partner risk assessment • ESG audits and assessment through available information • Business partner code of conduct

SUPPLY CHAIN RISK ASSESSMENT AND DUE DILIGENCE EVALUATION

In accordance with our 4 year plan and the OECD guidelines, General Oceans conducted its first due diligence analysis on the top 15 material and part suppliers for matured operating companies and the top 5 material and part suppliers for acquired operating companies.

The Group’s two-tier Supply Chain Risk Assessment process begins with a comprehensive evaluation of our suppliers using a weighted scoring system from a quantitative perspective, which considers a range of attributes, notably the geographical location of the supplier that is particularly relevant to assessing potential risks associated with labour or human right issues.

Based on the accumulated score, each supplier is categorised into various risk levels. Following this initial assessment, suppliers classified under higher risk categories are subjected to a more detailed follow-up actions.

The Group also implements a qualitative aspect to our risk assessment process, conducting thorough searches for any reported investigations or violations of local laws across various domains. Suppliers with such findings are immediately classified as higher risk and consequently subjected to more detailed follow-up actions.

EMBED RESPONSIBLE BUSINESS CONDUCT INTO POLICIES AND MANAGEMENT SYSTEM

As a responsible business, we are committed to embedding responsible business conduct (“RBC”) into our policies and management systems. This commitment starts at the highest level of our organization, with our board and executive team setting clear expectations for ethical behaviour and responsible practices. Our policies, including but not limited to those on labour rights, working conditions, child labour, and forced labour, are designed to align with international standards and OECD guidelines. They serve as the framework for what we expect from our employees and business partners. To ensure these policies are effectively implemented group-wide, we integrate them into our management systems across all levels and departments. This includes regular training and education for our staff on RBC issues, conducting thorough due diligence and risk assessments, implementing remediation plans when necessary, and maintaining open lines of communication for reporting concerns or violations. Furthermore, we consistently track our progress and outcomes, and use this information to continually improve our RBC performance. In doing so, we ensure that responsible business conduct is not an add-on, but an integral part of how we operate.

The Group also makes it a priority to incorporate our RBC expectations and policies into all our suppliers and business partners. This starts from the very beginning of our relationship, where we communicate our standards and expectations clearly during the supplier selection process. Suppliers are required to acknowledge our Supplier Code of Conduct Policy upon engagement. We also encourage our suppliers to extend these RBC principles further down their own supply chains.



GENERAL OCEANS

By integrating RBC into our supplier relationships in this way, we aim to create a network of partners who share our commitment to ethical business practices, respect for human rights, and environmental sustainability. This approach not only helps to mitigate potential risks, but also contributes positively to the reputation and long-term success of our company and our partners.

ACTUAL ADVERSE IMPACTS IDENTIFIED

Based on the results of due diligence, no high-risk suppliers are identified.

MEASURES TO CEASE OR MITIGATE SIGNIFICANT RISKS OF ADVERSE IMPACTS

Upon identifying high-risk suppliers, we immediately commence with a comprehensive risk assessment to scrutinise the nature and extent of the potential hazards involved. Subsequently, a remediation plan is drafted to outline detailed measures to mitigate these risks, coupled with a regime of increased monitoring to ensure adherence to safety protocols and to promptly identify any emergent issues. Additionally, we implement an intensive training and support program for the supplier's personnel to help them understand the issues and provide support for necessary improvements. Lastly, a rigorous re-evaluation process is set in place, systematically reassessing the supplier's risk profile to track improvements and identify any persisting or new risk factors.

TRACK IMPLEMENTATION AND RESULTS

We employ a systematic approach to track the implementation and results of our supply chain risk assessment. This includes maintaining a comprehensive database of all suppliers, their due diligence records, risk assessment results, and any issues or incidents that arise. We use this database to monitor progress and measure improvements over time. Tracking can be done both quantitatively, through key performance indicators such as the number of suppliers assessed, incidents reported and resolved, and qualitatively, through narrative reports detailing the nature of risks identified and the effectiveness of mitigations put in place.

We will periodically conduct follow-up assessments or audits to ensure the continued compliance of suppliers. The results of this tracking are reported to the executive management regularly and form a crucial part of our transparency reporting as required by the Norwegian Transparency Act. This thorough tracking system allows us to identify trends, highlight areas for improvement, and measure the effectiveness of our efforts to manage supply chain risks.

Based on the Group's four year plan, the Group is now in the process of expanding the scope of supplier risk assessment for matured operating company and incorporating group-wide supplier policies with the acquired operating companies. We will continue to follow up with the implementation and improvements by suppliers regularly as the process unfolds.

COMMUNICATE HOW IMPACTS ARE ADDRESSED

In the event that supplier due diligence identifies high-risk suppliers, we will initiate a dialogue with the supplier concerned to communicate our findings and concerns. This communication will be conducted in a constructive, clear, and respectful manner, outlining the specific areas where the supplier did not meet our expectations or standards, and indicating the potential impacts on human rights, working conditions, or environmental sustainability.

We will provide recommendations for remedial actions and offer support where feasible to help the supplier improve its practices. However, we will also make it clear that continuous non-compliance could result in a review of our business relationship, up to and including the termination of contracts. We believe that such open and honest communication can help our suppliers understand the importance of responsible business practices and encourage them to address the impacts effectively and promptly.



GENERAL OCEANS

PROVIDE FOR OR COOPERATE IN REMEDIATION WHEN APPROPRIATE

If we find evidence of violation of human rights in our supply chains, we will take immediate action to protect the individuals involved, which may include working with suppliers to improve conditions, reporting to authorities, or terminating contracts with suppliers who continue to violate this policy.

SIGNATURE PAGE BY THE BOARD OF DIRECTORS

Beatriz Malo de Molina, Chair of the Board of Directors
(Electronically signed)

Tor Kim Steinsland
(Electronically signed)

Stein Dale, Director
(Electronically signed)

Hanne Blume, Director
(Electronically signed)