

## **TRANSPARENCY ACT REPORT**

### **WNS Pomorze NUF**

#### **1. Purpose of the Act**

The Norwegian Transparency Act came into force on 1 July 2022. Its objective is to promote companies' respect for fundamental human rights and decent working conditions related to production of goods and provision of services and to provide information to the public about how companies manage the negative impact on human rights and decent working conditions.

#### **2. The Report**

The Act stipulates that NUF shall carry out the due diligence process and publish the account of the assessment. This report summarizes the policies and procedures WNS Pomorze's NUF regarding safeguarding of human rights and decent working conditions and provides information on the implementation and results of WNS Pomorze's due diligence.

#### **3. About WNS Pomorze ("the Company" or "WNS Pomorze")**

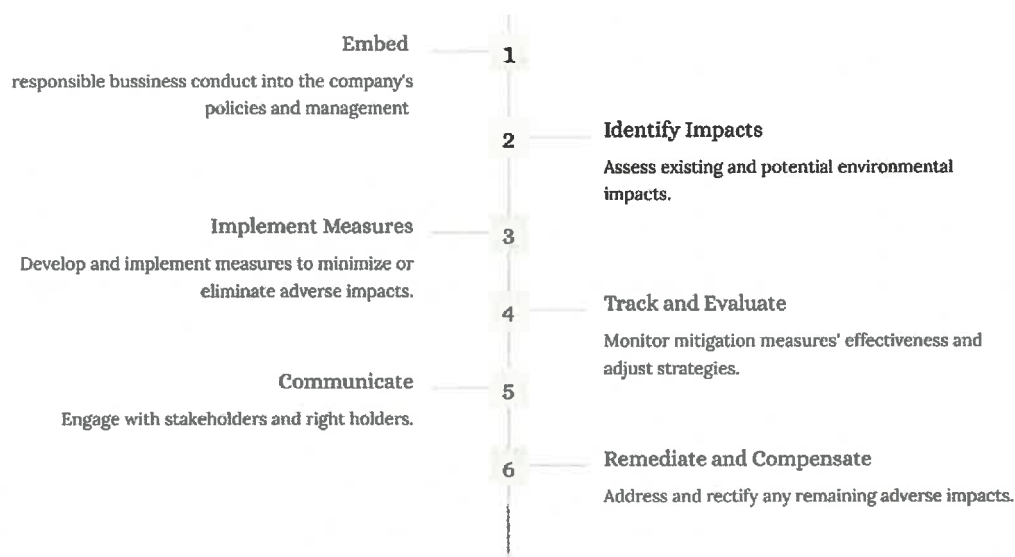
WNS Pomorze NUF operates in Norway since 2006 as a Norwegian-registered foreign company under the registration number 990 060 142. WNS Pomorze's registered address is Havnegata 10, 3040 DRAMMEN. The Company belongs to WNS Pomorze Sp. z o. o., registered in Poland. Since 2006, the Company has focused on providing workers to Norwegian shipyards. In 2024, its primary business activity in Norway is staffing services for shipyards.

WNS Pomorze is registered in the Norwegian Labor Inspection Authority as a staffing company ('bemanning foretak').

#### 4. Duty to carry out due diligence to ensure acting with respect to the Transparency Act

We conducted the process according to the steps below:

### Step-by step process



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#### 5. Governance of human rights and decent working conditions

WNS Pomorze works to ensure that our business operations do not cause or contribute to, or are linked to, actual or potential adverse impacts on human rights and decent working conditions. Human rights are monitored through meetings, audits, and ongoing collaboration with our partners also with trade unions in Norway.

Additionally, our company's procedures are designed to mitigate actual and potential adverse impacts related to human rights and decent working conditions.

The WNS Pomorze **Code of Conduct** outlines guidelines for employees in their professional activities and interactions with colleagues, vendors, customers, contractors, government agencies, and the public, emphasizing integrity and ethical conduct. The Company has established a **whistleblower channel** that will help uncover negative consequences for fundamental human rights and decent working conditions. Additionally, we focus on minimizing risks associated with **money laundering and terrorist financing**.

**Human Rights Policy** establishes procedures to ensure respect for the human rights of the people we cooperate with.

## 6. Risk analysis and mitigation of risk

The Company operates in an environment with low human rights risk, as all our activities are based in Norway—a country with consistently low risk on international human rights indices and robust general and industry-specific regulations that safeguard human rights.

However, since we send employees to work at shipyards, we check whether our employees are exposed to risks such as:

- poor working conditions
- insufficient wages
- poor living conditions at the shipyards
- breaches regarding working hours
- breaches regarding health and safety.

Our analysis, including communication with partners and the assessment of contracts and the companies we cooperate with, did not reveal any actual adverse impacts on fundamental human rights or fair working conditions related to our business operations. We have sent a questionnaire to our main business partner focusing on working conditions and reporting potential breaches.

Although the risk assessment results were positive, we acknowledge the importance of maintaining vigilance and striving for continuous improvement. We remain fully committed to regular risk assessments, recognizing the significance of the Act's purpose.

## 7. Focus and plans

Moving forward, we will continue to monitor both actual and potential risks of negative impacts on human rights and fair working conditions within our operations. We will raise awareness within the WNS Pomorze organization regarding human rights issues and



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encourage initiatives that uphold fundamental human rights and fair working conditions through collaboration with our partners.

Detailed information can be provided upon request in accordance with the Transparency Act § 6. Please feel free to contact us at the following email address: [wns@wnspomorze.pl](mailto:wns@wnspomorze.pl).

President of the Management Board

A handwritten signature in blue ink that reads 'Ewa Kaliszewska'.

Ewa Renata Kaliszewska