

Subshore - Routines for fulfilling duties pursuant to the Transparency Act

Purpose

The routine will help Subshore, and the cooperation we have with all our suppliers, to promote the purpose of the Transparency Act. This entails respecting fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensuring public access to information on how businesses deal with negative consequences for fundamental human rights and decent working conditions.

The routine shall ensure that our operations meet the requirements for performing and accounting for due diligence, as well as safeguarding the duty of disclosure in the Transparency Act.

Circumference

The routine includes due diligence related to direct and indirect purchases in our business. Due diligence is based on a risk-based approach.

Responsibility

The general manager is overall responsible for the routine and shall, in consultation with the professional managers, ensure that due diligence is carried out in the various parts of our company's business areas.

Description

The introduction of due diligence is to be based on the OECD Due Diligence Model for Responsible Business Conduct:

FIGURE 1. DUE DILIGENCE PROCESS & SUPPORTING MEASURES



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Conducting due diligence

Due diligence shall be carried out according to the following working methodology:

- We hold a separate work meeting for the implementation of due diligence at least 1 time per year.
- Here we carry out risk mapping related to our purchases of goods and services, related to due diligence in relation to the Transparency Act.
- We will seek available information on supply chains and risk mapping from NHO and other industry associations with which we are affiliated, as well as from other relevant actors.
- Based on the risk mapping prepared, a concrete plan for improvement and measures is drawn up. Prioritisation and materiality assessment determine the order in which the measures are to be implemented and implemented.
- We must document our results of this risk mapping in an annual written report. In accordance with the Transparency Act, this report, from our due diligence assessments, is published readily available on our company's website, under the "References and reports" area (orange headings).
- In accordance with the Transparency Act, Subshore will disclose in our annual report, where the report is available, and update and publish the report by 30 June each year.

Measures to stop, prevent and reduce negative impact/damage

- Based on our risk mapping and associated prioritization/materiality assessment, specific measures shall be assessed and decided by the responsible purchaser (the term purchaser also includes contract manager)
- Measures can be implemented directly towards suppliers from our business or by a joint inquiry from the industry through industry associations or other partners. All inquiries regarding this, in case it is to be submitted by our trade association, should be sent to advokat@nhos.no

Changes:

- If our operations in a purchasing area become aware that there may be significant changes in supply chains, the supplier shall be responsible for purchasing, follow this up and, if necessary, ensure that due diligence is revised and documented in a written statement. This must always be stored in Antenor, and sent as a copy to the general manager, so that we ensure information and that this is discussed in the next meeting.

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Follow-up of measures and their effect

- In the working meeting (ref. section on due diligence above), the responsible purchaser shall ensure follow-up and evaluation of measures

Deviation

- In case of suspected breach of contractual obligations related to the Transparency Act, deviations must be reported to the general manager
- The purchaser will follow up the respective supplier to our business
- Treatment of nonconformities is documented in a written statement

Processing information claims

- Everyone has according to. The Transparency Act, upon written request, is entitled to information on how our business handles actual and potential negative consequences related to human rights and decent working conditions in our supply chains.

This includes both general information and information relating to a particular good or service offered by the enterprise.

- If we receive a request for information, the purchaser must be contacted to answer and handle the information requirement

References and related documents

- Act relating to corporate transparency and work on fundamental human rights and decent working conditions (Transparency Act, LOV-2021-06-18-99)
- Subshore's guide for the selection of serious players with reference to the Transparency Act and relevant documents as well as special contractual provisions, etc.