



# THE TRANSPARENCY ACT

Due diligence assessment 2026





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The Norwegian Transparency Act (Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions) entered into force on 1 July 2022.

Polynt Composites Norway AS ("PC Norway AS" or "the Company") falls within the scope of the Act pursuant to Sections 2 and 3.

## 1.0 INTRODUCTION

PC Norway AS had sales revenues of 370,076,820 NOK, in the fiscal year 2025. The balance sheet total is 313,501,657 NOK, in the fiscal year 2025.

In 2025, the company had an average of 44 full-time equivalents. Based on this, the company is required to report.

	Men	Women
Total	34	10
White Collar	8	8
Blue Collar	1	18
Management	1	8

The Transparency Act §4 requires PC Norway AS to perform due diligence assessments to identify actual and potential negative consequences for fundamental human rights and decent working conditions, see §4 letters a-f. According to §5 of the Act, the results of the due diligence assessments must be published through an annual statement.

This document contains a statement of the due diligence assessments that the company has carried out in the period from **June 30<sup>th</sup>, 2025**, to **June 22<sup>th</sup>, 2026**.

The purpose of the due diligence assessments is to provide the public with insight into how the company has conducted the assessments, the key findings from the assessments, and the measures the company has implemented.

The statement is structured as follows:

### 1.1 GENERAL INFORMATION

Contains a description of PC Norway AS's organization, operational area, market area, guidelines, and procedures for handling and following up on the Transparency Act.

### 1.2 NEGATIVE CONSEQUENCES AND RISK

Method for due diligence assessments, information about actual negative consequences and significant risks, as well as the results of the assessments PC Norway AS has carried out.

### 1.3 MEASURES

Contains a statement of the measures PC Norway AS has implemented to follow up on the results of the due diligence assessments, as well as prioritized areas for further development of the assessments.



## 2.0 GENERAL INFORMATION ABOUT THE COMPANY

### 2.1 ORGANIZATION

PC Norway AS is part of SCIL group. PC Norway AS is a subsidiary of Polynt S.p.A, headquartered in Scanzorosciate, Italy.

### 2.2 PRODUCTS, SERVICES, AND MARKETS

PC Norway AS is a manufacturer of unsaturated Polyester, Gelcoat, and Bonding paste for the composite industry, selling products to customers mainly in Norway and Europe. Raw materials for PC Norway AS's production are chemicals mainly imported from European producers and distributors.

### 2.3 ANCHORED WORK WITH HUMAN RIGHTS AND DECENT WORKING CONDITIONS

PC Norway AS's work with human rights and decent working conditions is anchored locally at PC Norway AS and centrally in the Polynt Group:

**Locally:** "Policy for PC Norway AS's work with human rights and decent working conditions (Transparency Act)" and in the company's personnel handbook.

The General Manager, Logistics, and HSE follow up routines and reporting around due diligence assessments in line with the Transparency Act.

**Centrally:** The group has policies for:

- Whistleblowing
- Anti-corruption and Bribery
- Environmental, Social & Governance (ESG)
- Health, Safety, Environment (HSE)
- Labor and Human Rights
- Ethical code
- Supplier code of conduct

They can be found at the following link: [Polynt Group Sustainability](#)

### 2.4 CONTACT INFORMATION

The company has appointed the General Manager as the contact person for inquiries regarding due diligence assessments to our company.

**Centrally:** [Polynt Group Sustainability](#)

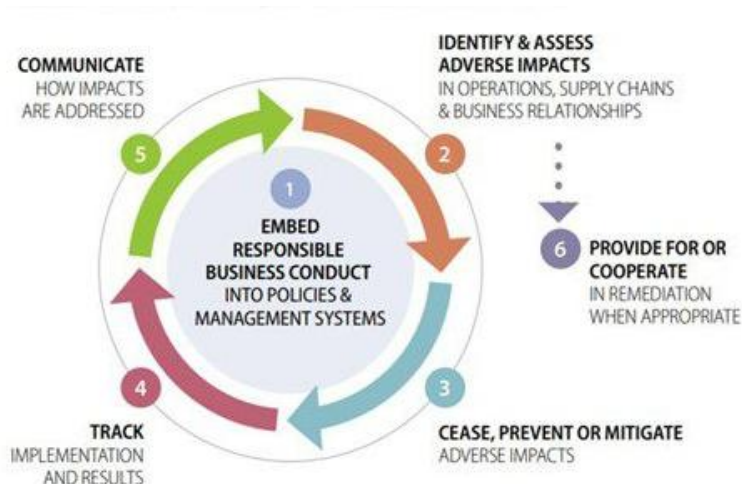
Polynt Group works according to ESG. A separate department has been established centrally for this work. All companies, including PC Norway AS, which are part of Polynt Group contribute to mapping within environment, labor and human rights, ethics, and sustainable procurement.

## 2.5 WHISTLEBLOWING CHANNELS AND COMPLAINT MECHANISMS

**Centrally:** The Group provides a dedicated whistleblowing portal at the following address: <https://scil.world/>

**Locally:** The company has a "Committee for Equality and Discrimination" with representatives from HR, HSE, Administration, Production, and Safety Representative. The company conducts annual employee interviews with all employees.

## 3.0 DUE DILIGENCE AND RISK ASSESSMENTS – ROUTINES



PC Norway AS is certified according to ISO 9001. In the company's quality assurance system, a functional description with instructions for performing due diligence assessments according to the Transparency Act has been prepared.

An overview of suppliers of goods and services to the company for the year 2024 has been prepared. Based on the overview, based on assumed risks such as working conditions, type of industry, country of origin, assumptions, and generally known information from, for example, media, suppliers will be prioritized for due diligence assessments.



### 3.1 SUPPLIERS

Suppliers are divided into groups:

- Raw material suppliers, producers, and distributors of chemical raw materials, packaging, etc.
- Transport and forwarding services, bulk and packaged goods. We have selected transport based on the knowledge we have of the mobility package introduced in 2022, which focuses on improving regulations and enforcement related to working conditions and businesses within road transport.
- Purchase of goods (general), workwear, protective equipment, and office supplies, etc.
- Purchase of services, hired personnel.

The company locally sends out and follows up on the Supplier Code of Conduct ([Supplier-Code-of-Conduct\\_for-website.pdf](#)) for local agreements/contracts. A cover letter with reference to the Transparency Act has been prepared.

A questionnaire has been prepared and sent to suppliers to ensure that we work preventively with due diligence assessments.

The results from the responses received will be part of the risk analyses. The ESG team in the group sends out and follows up on the Supplier Code of Conduct for group-based agreements/contracts.

Polynt Group's Sustainable Purchasing Policy supports and operationalizes the requirements of the Transparency Act by establishing systematic processes for due diligence assessments in the supply chain, with a particular focus on human rights and decent working conditions.

#### 1. Due diligence assessments (§ 4)

The policy describes how Polynt Group:

- Maps the supply chain,
- Identifies and prioritizes ESG risks based on country, sector, activity and type of supplier relationship,
- Conducts risk-based assessments both when onboarding new suppliers and during annual follow-up of existing suppliers.

This corresponds directly to the legal requirement for ongoing due diligence assessments.

#### 2. Prevention and follow-up (§ 4)

Through:

- Requirement for a signed Supplier Code of Conduct,
- ESG self-assessment form,
- Assignment and use of Supplier ESG scores in supplier evaluations,

The Group has established measures to prevent, limit and follow up actual and potential negative impacts related to human rights and labor conditions.

#### 3. Integration into the business (§ 4)

The policy is anchored in:

- The purchasing and supply chain function,
- The ESG function at the group level,
- Annual structured interaction between esg and supply chain.

This ensures that due diligence is integrated into daily decision-making processes, as required by the Transparency Act.



#### 4. Documentation and reporting (§ 5)

The policy lays the foundation for:

- Documentable supplier follow-up,
- Traceability of assessments and measures,
- Basis for the annual report pursuant to the transparency act.

#### 5. Information and responsibility (§ 6)

Clear responsibility is placed on managers for:

- Internal communication of the policy's content,
- correct compliance within their own organization.

This supports the law's requirement for clear roles and responsibilities.

### 4.0 GOALS AND PROGRESS

#### 4.1 GOALS FOR THE COMING YEAR

The following concrete goals have been set:

OBJECTIVE	STATUS
<ul style="list-style-type: none"> <li>▪ We will further develop the due diligence assessment based on the experiences we make</li> </ul>	<i>Under work</i>
<ul style="list-style-type: none"> <li>▪ We will raise internal competence in our company regarding sustainability and responsible procurement</li> </ul>	<i>Under work</i>

### 5.0 DUE DILIGENCE AND RISK ASSESSMENT – COMPLETED/ONGOING WORK

#### 5.1 INTERNAL CONDITIONS

PC Norway AS focuses on the working environment and safety and works according to the following priorities:

- Safety
- Quality
- Efficiency

The company has rules for the use of workwear and protective equipment that must be followed by all employees and visitors.

The company is affiliated with occupational health services and systematic health checks are carried out for all employees.

In collaboration with occupational health services, measurements are carried out on noise, dust, and vibrations in risk areas, training in chemical health hazards, and other relevant follow-up.

It is reported to and collaborated with the ESG team in the group for the company's various functions regarding sustainability and equality.

This includes work with human rights such as wage conditions between genders and job groups, leave opportunities, whether we have employees from minority groups or particularly vulnerable groups, and whether employee interviews are conducted.



EcoVadis is a globally recognized platform that assesses the company's sustainability based on four key categories: environmental impact, labor and human rights standards, ethics, and procurement practices.

The purpose of the EcoVadis ranking is an annual measurement of the quality of a company's corporate social responsibility (CSR) management system through guidelines, actions, and results.

PC Norway AS is evaluated in EcoVadis in the assessment of Polynt SpA (Group) which obtained in 2025 a score of 67/100 and the Bronze medal.

In collaboration with the "Equality and Discrimination Committee," a survey has been conducted among employees to uncover any negative incidents/cases related to equality and discrimination and to be able to implement measures.

Questions have been asked about the following points:

- Recruitment
- Promotion and development opportunities
- Wage and working conditions
- Facilitation
- Opportunity to combine work life and family life
- Harassment, sexual harassment, and gender-based violence
- Working environment

Based on the survey, measures and follow-up plans have been created.

Employee interviews have been conducted with all employees according to ISO 9001. Points that require measures and attention are particularly emphasized in the employee interviews. The survey revealed a need for more information and various measures.

## **5.2 EXTERNAL CONDITIONS**

The company uses forms developed within the group for risk assessments of suppliers. The prioritization of which suppliers are assessed for risk is based on an overview of suppliers of goods and services.

Selection of suppliers is, for example, based on:

- Industry
- Low-wage occupation
- Origin
- Size of suppliers

We have chosen to use the group's questionnaire so that we can view both local and central suppliers as a whole.

The questionnaire focuses on the following points:

- Corporate governance and ethics
- Social sustainability
- Environmental sustainability
- Sustainability in the supply chain
- Reporting and accountability

The questionnaire has been sent to a selection of suppliers. Unlike previous years and the start of the due diligence assessments, we now observe that there is greater familiarity with the Transparency Act

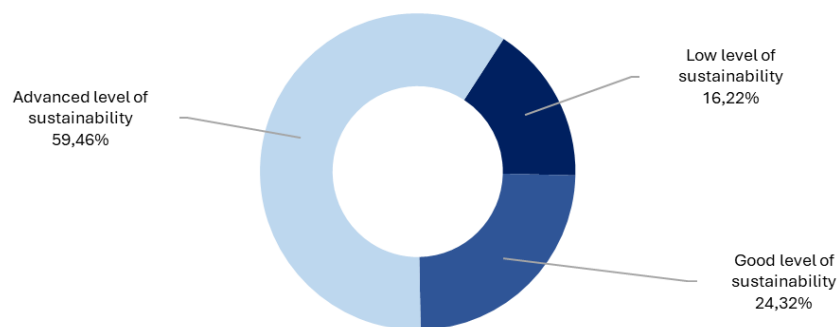


and its requirements among the suppliers. There is a better understanding of the questionnaire that has been sent out, and we receive feedback quickly from most suppliers. The content of the feedback is clearer, showing anchoring in the companies.

In many cases, documentation is also received with reference to Ethical Trade and the companies' Code of Conduct, alternatively, we receive our Code of Conduct returned in signed form. The feedback received has provided us with a basis for evaluating our suppliers and putting it into a system.

## 6.0 RISK ASSESSMENT BASED ON FEEDBACK

SUPPLIER ASSESSMENT 2026 RESULTS



This form of mapping and risk assessment is an ongoing process.

## 7.0 DUE DILIGENCE AND RISK ASSESSMENT – CONSEQUENCES OF NEGATIVE FEEDBACK

If violations of human rights and decent working conditions are discovered, measures will be implemented to stop, prevent, and mitigate negative consequences based on the company's assessments.

Measures may include:

- Encouraging changes in working conditions, routines, etc., at the supplier
- Changing suppliers

As of today, no critical issues have been identified from the distributed questionnaires, and no critical issues have been identified regarding human rights and labor rights.



Fredrikstad, 22.06.2025

Signed by the company's Board of Directors:

**Maurizio Leonardi** - Chairman of the board

**Njål Vonen** - Board Member

**Morten Hulleberg** - Board Member