



## Procedure for processing requests for information relating to human rights and decent working conditions

This document outlines G2 Ocean's procedure for processing requests for information relating to human rights and decent working conditions as required by the Norwegian Transparency Act.

## Objective

To detail how G2 Ocean will process requests for information requests in relation to how G2 Ocean addresses actual and potential adverse impacts pursuant to Section 4 of the Norwegian Transparency Act. This includes both general information and information relating to a specific product or service offered by G2 Ocean.

## **Right for Information**

G2 Ocean shall carry out due diligence in accordance with the OECD Guidelines for Multinational Enterprises and therefore any person has the right to information regarding how G2 Ocean addresses actual and potential adverse impacts on how it has completed due diligence.

For the purposes of this Act, due diligence means to

- a) embed responsible business conduct into the enterprise's policies
- b) identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that the enterprise has either caused or contributed toward, or that are directly linked with the enterprise's operations, products or services via the supply chain or business partners
- c) implement suitable measures to cease, prevent or mitigate adverse impacts based on the enterprise's prioritisations and assessments pursuant to (b)
- d) track the implementation and results of measures pursuant to (c)
- e) communicate with affected stakeholders and rights-holders regarding how adverse impacts are addressed pursuant to (c) and (d)
- f) provide for or co-operate in remediation and compensation where this is required.

A request for information may be denied if:

- a) the request does not provide a sufficient basis for identifying what the request concerns
- b) the request is clearly unreasonable
- c) the requested information concerns data relating to an individual's personal affairs
- d) the requested information concerns data regarding technical devices and procedures or other operational and business matters which for competitive reasons it





is important to keep secret in the interests of the person whom the information concerns.

The right to information regarding actual adverse impacts on fundamental human rights with which G2 Ocean is familiar, applies irrespective of the limitations in the previous paragraph.

The right to information does not cover information that is classified pursuant to the Security Act or protected pursuant to the Intellectual Property Rights Act.

## Processing of requests for Information

The information request shall be provided in writing and shall be adequate and comprehensive. Requests for information shall be sent to <a href="mailto:compliance@g2ocean.com">compliance@g2ocean.com</a>.

The Director Compliance, Risk and Business Process is responsible for coordinating with the Legal and Compliance team G2 Ocean's response to any requests.

G2 Ocean shall provide information within a reasonable time and no later than three weeks after the request for information is received. If the amount or type of information requested makes it disproportionately burdensome to respond to the request for information within three weeks, the information shall be provided within two months after the request is received. G2 Ocean shall then, no later than three weeks after the request for information is received, inform the person requesting information of the extension of the time limit, the reasons for the extension, and when the information can be expected.

If G2 Ocean denies a request for information, it shall inform about the legal basis for the denial, the right and time limit for demanding a more detailed justification for the denial and that the Consumer Authority is the supervisory and guidance body.

Any person whose request for information is denied may within three weeks from the denial was received, demand a more detailed justification for the denial. The justification shall be provided in writing, as soon as possible and no later than three weeks after the demand for a more detailed justification was received.

All requests and correspondence shall be stored in the Legal and Compliance Teams Site under Request for Information.