

# Norwegian Transparency Act Statement

Lufttransport  
Financial Year 2023

# Introduction

The Lufttransport-group is within the scope of the Norwegian Transparency Act (NTA). The NTA has three main requirements:

1. Conduct a human rights and decent working conditions due diligence.
2. Publish a report/account of the due diligence assessment on the company's website
3. Any person has the right to information about the company's due diligence assessments related either to the company as a whole, or to a specific product.

This report covers the entire business of Lufttransport Adm AS, including the subsidiaries Lufttransport FW AS, Lufttransport AS, Lufttransport RW AS, and LT Tech AS (hereinafter collectively referred to as "Lufttransport").

This report will give an account of how Lufttransport has conducted and manages its due diligence assessments, the actual and potential negative impacts on human rights in their own operations and in their value chain, as well as the measure implemented to manage these risks for the 2023 financial year.

## Who we are

### Values

Lufttransport aims for sustainable aviation, in every context of our activities.

In Lufttransport our goal and shared values regarding the basic purpose of the company, approved by the Board of Directors, is aiming for sustainable aviation which contributes to safe and effective delivery of products and services. It however also indicates how we look at ourselves and our strategic intention for the development of the company for the future.

We have formulated 4 core values as a guidance for the day-to-day operation which all leaders and employees shall be familiar with and which subsequently together with this Vision statement is broken down into overall guidelines and goals for each unit and each manager of the company.

#### *Our Vision:*

Sustainable growth in the aviation business, based on a safe and sound economics, health, safety

and environmental foundation.

*Our Goals:*

A preferred provider of fixed-, rotor wing operations and/ or maintenance services. The organisation is agile, flexible, reliable, just culture and customer focused. All this is supported by resilient performance: how we respond to, monitor, learn and anticipate the context (operating environment in short- and long term) which we do our business in.

*Our Values:*

*Safety* - We treat safety as a moral imperative. Safety is our way of business.

*Authenticity* - We do what we say.

*Loyalty* - Empowering employees to be fulfilled in their careers. Focus on customers and business sustainability.

*Accountability* - Ownership of employee well-being & customer satisfaction.

In Lufttransport, we take responsibility for having a positive impact on the people and local communities where we conduct our business. We take responsibility for human rights in our value chain.

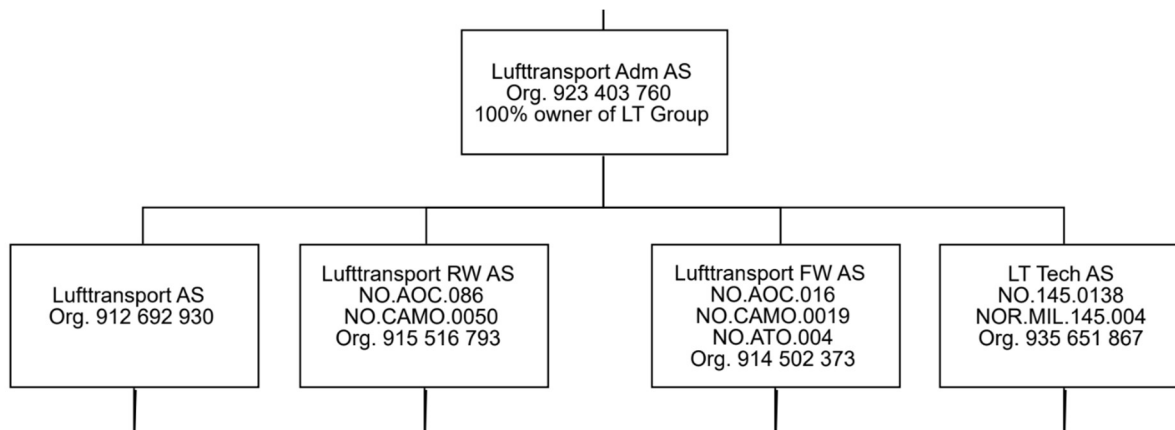
## Our Business

Lufttransport was established in 1955 as an independent company dealing primarily with aviation activities. The company currently has approximately 35 employees, and is a highly competent special mission's operator, and one of the oldest aviation companies in Norway.

The organisation(s) has developed a very broad level of experience among technical, operational, and administrative personnel and is well regarded and established in the market.

The Lufttransport group's head office is in Tromsø, and secondary bases are located across the country. All operations are executed in Norway including Svalbard, some missions will however cross surrounding borders (Finland, Sweden, Greenland, Faroe Islands, Great Britain and Russia) to be accomplished.

The Lufttransport Group is comprised of the parent company Lufttransport Adm AS, which owns 100% of the shares in its subsidiary companies Lufttransport AS, Lufttransport RW AS, Lufttransport FW AS, and LT Tech AS.



*Luftransport Adm AS* is a holding company, which own shares in operation companies.

*Luftransport AS* provides internal services such as HR, finance, HSECQ, operation control centre and IT to the operating organisations in the Luftransport group.

*Luftransport FW AS* operates airplanes in Charter (Passenger and Freight) for Kings Bay (Research station in Ny-Ålesund). Luftransport FW also delivers Ad-hoc Freight and Passenger transport. The company operates the Aircraft type Dornier 228-202K/212NGg

*Luftransport RW AS* operates Route flying for the Ministry of Transport and ad-hoc charter transport. The company operates the aircraft type Leonardo AW139 (Route, Ad-hoc, charter).

*LT Tech AS* is a 100% owned maintenance organisation and provides technical services to contracted and ad-hoc operators. LT Tech is the main provider of technical services to Luftransport FW and RW AS. The relationships between the companies are close, and they share the same facilities in Tromsø, and on our bases across the country.

## Roles and responsibilities

The overarching responsibility for the compliance with the Transparency Act rests with the Chief Financial Officer and the Compliance Monitoring Manager, who are employed by Luftransport AS. Together, they ensure adherence across all subsidiaries and lead the efforts to update the group's procedures and guidelines for the safeguarding of human rights and decent working conditions within their own operations and throughout the group's value chain.

The Compliance Monitoring Manager has a particular responsibility for adhering to laws and

regulations relevant to Lufttransport and works continuously to ensure that all subsidiaries conduct their business in accordance with applicable legislation.

It is the responsibility of the company boards, through the Chief Executive Officer, to have the ultimate responsibility for the ethical guidelines and to ensure that these are followed. Each employee is obligated to familiarise themselves with the provisions and instructions that apply to their position at all times and bears a personal responsibility to adhere to the guidelines.

Each leader is responsible for ensuring that the guidelines are known and followed within their area of responsibility. The leader must ensure that any breaches of the guidelines or the development of an unfavourable culture within the company are immediately addressed.

## Our policies and procedures

Lufttransport guidelines highlight the expectations of companies for employees, management, and suppliers regarding the exercise of ethical behaviour. Lufttransport is committed to safety and quality in all the services they provide, as well as with their contractual partners. As part of the work with the NTA, this focus has been expanded by requiring the safeguarding of human rights and decent working conditions in the supply chain. In our supplier evaluation, requirements are now set for the safeguarding of these rights, including the safeguarding of fundamental human rights, combating child labour, and taking into account climate and environmental considerations in accordance with national and international legislation.

### *Ethical guidelines*

Lufttransport has ethical guidelines that describe the ethical principles we should govern our business by, and the behaviour we expect from our employees at all levels.

Lufttransport aims to be a responsible community actor. All impact on the surrounding community and the international community should be in accordance with laws and regulations. The company should at all levels counteract child labour, work for human rights and equality based on the company's value foundation and ethical guidelines. International conventions ratified by Norway should be complied with in international interaction and cooperation. Especially within the areas of human rights, civil and political rights, prohibition of child labour, children's conventions, and indigenous peoples' rights, the company should be a responsible community actor. This work should also be taken care of in a suitable manner towards our suppliers, customers, and partners. As a minimum, new suppliers should be assessed against their compliance with human rights, and change processes within Lufttransport should map the impact on human rights.

### *Quality & Compliance Policy*

Lufttransport shall always remain in compliance with the applicable regulations. Only by providing the standard of quality and service contracted with our customers and by constantly striving to maintain and improve the standard and Quality Management System, can we continue to be a respected provider of services.

It is the duty of all personnel to comply with this policy, the procedures, quality standards and the

regulations and to strive to both maintain and improve quality standards at every opportunity. All employees shall be properly trained and encouraged to report errors/incidents.

As a pro-active and business continuity tool, risk management shall be executed whenever necessary.

### *Environmental Policy*

Luftransport's impact on the environment will be strived to be minimized appropriate to our activities nature. Our vision is to support sustainable growth in aviation business, based on a safe and sound economics, health, safety, and environmental foundation. By supporting environmental sustainability and believing that a successful future for our business and the customers, Luftransport depends on the sustainability of the environment, communities, and economies in which we operate.

As a responsible corporate citizen, we hold a responsibility to consider impacts of our actions, our environmental footprint and how they affect the environment both directly in terms of our own operations, and indirectly through our purchasing decisions, the products, and services we offer to our customers and the business opportunities we pursue. We are committed to minimizing the impact of our operations on the environment and to demonstrating leadership by integrating environmental considerations into all our business practices.

We will conduct our business in accordance with relevant regulations and environmental laws. All employees have a responsibility to ensure and work towards less environmental impact from our business on a day-to-day basis. We shall cooperate with our partners and suppliers in the environmental and security issues and may require that they participate actively in order to continuously improve our overall environmental impact.

### *Safety Policy*

Safety is the first priority in all our activities, it is our way of business. We are committed to implementing, developing and improving strategies, management systems and processes to ensure that all our aviation activities uphold the highest level of safety performance and meet national and international standards. Luftransport acknowledges that as an approved aviation company gives increased vulnerability to insider threats aimed at aviation. To Counter such insider threats, measures have been established to promote a security culture and increase employee vigilance.

### *Supplier Evaluation Form*

Luftransport uses a "Supplier Evaluation Form" to evaluate and gather information from its suppliers. The form contains questions about certifications, HSE (Health, Safety, and Environment), procurement, supplier control, human rights, working conditions, and the environment. Based on the supplier's answers, an assessment is made to consider whether the

supplier is confirmed. If a contract cannot be entered into based on the provided information, a quality audit of the supplier is conducted.

## Due diligence process

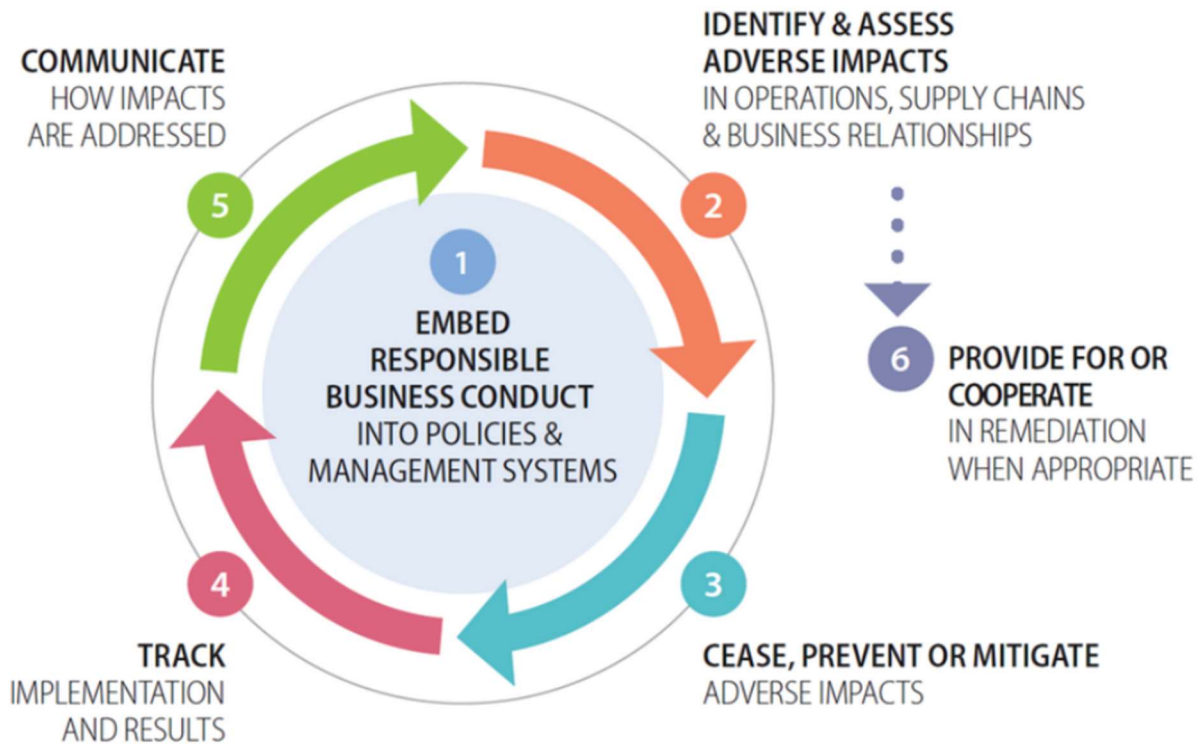
### The Norwegian Transparency Act and OECD guidelines for multinational enterprises

Luftransport supports the United Nations Guiding Principles on Business and Human Rights (UNGP) and the OECD Guidelines for Multinational Enterprises' approach to due diligence assessments.

We recognize the need to have internal systems in place to identify and manage negative impacts that our business may have on fundamental human rights and decent working conditions, as well as to account for our due diligence assessments. We also acknowledge that our work in this area is a dynamic and ongoing activity, and that relevant risk conditions may change over time in line with operational changes or external influences.

To identify, prevent, mitigate, and account for such risks, Luftransport has conducted due diligence assessments.

The OECD guidelines are visualized in the figure below which describes the process of identifying and reducing risk, as well as the importance of monitoring and communicating the results of the due diligence assessment.



<https://www.oecdguidelines.nl/oecd-guidelines/due-diligence>

The process for mapping our own operations, suppliers and business partners.

Luftransport has a quality assurance program that all suppliers must go through to be recognised as a supplier. Suppliers are evaluated and selected based on their ability to meet the requirements of the contract, as well as their response to the Supplier Evaluation Form, which asks specific questions about the safeguarding of human rights and working conditions.

The responsibility for quality assurance of suppliers lies with the chairman of each subsidiary. All companies in the Luftransport group must have a list of contracts that are in force, and annual spot checks and audits of the contracts are conducted.

To map our own operations, we conduct an annual review of the HSE (Health, Safety, and Environment) manual and associated documents, and assess whether it is necessary to make changes to written procedures and documentation. If conditions are discovered that need to be changed or followed up on, these are incorporated into the action plan.



The following points are annually assessed:

- Is our HSE goals achieved?
- What is good, and what be be improved?
- Are procedures and checklists adequate?
- Are training routines sufficient?
- Is the safety inspection appropriate and are measures being implemented?

Within certain categories of products and services, the risk of negative consequences for human rights and decent working conditions will depend on which countries are involved in the production in the value chain. Therefore, in addition to assessing risks related to the relevant industry and the complexity of the supply chain, we take into account country risk in our due diligence assessments. Country risk will often be of crucial importance in the evaluations.

## Significant risks of adverse impacts

### Own operations

We have identified the following work areas for physical work environment, which trigger requirements for risk assessments:

- Use and handling of chemicals,
- Performance of hot work,
- Risk of exposure to biological factors,
- Exposure to factors harmful to reproduction,
- Exposure to noise and mechanical vibrations,
- Exposure to artificial optical radiation,
- Exposure to electromagnetic fields,
- Performance of work at height,
- Performance of manual work that may entail a risk of health-damaging stress,
- Avalanche danger,

### *Mapping of psychosocial work environment:*

In accordance with the Regulation on organisation, management and participation, section 7-1, we regularly survey and monitor the psychosocial working environment. This also includes work at home office if an agreement has been entered into for such work.

By psychosocial conditions, we mean factors in the working environment that affect the individual's work and how it affects the working person. These are, for example, well-being, positive challenges, demands and control, management support, co-determination, social support and violence or bullying.

Such examinations will be carried out with the occupational health service, which has special expertise in this area.

*Working hours:*

Working hours are regulated by the collective agreement in force at all times. Weekly working hours are currently 40 hours/week, with normal daily working hours from 8.00 a.m. to 16.00 including a half hour unpaid lunch break.

For personnel covered by collective agreements, reference is made to these. Otherwise, the working hours are stated in the employment agreement, and here it is also specified whether there is an opportunity for flexible working hours.

In line with the collective agreements to which the company is bound, shift/shift plans are drawn up and published. Reference is made to the individual collective agreements for this.

*Overtime:*

Overtime work must in each individual case be required and agreed upon and take place in accordance with Section 10-6 of the Working Environment Act.

Overtime must normally be agreed with the immediate manager. The employee cannot accrue overtime on his own initiative. Exceptions to this may follow from the collective agreement.

The working time arrangements must nevertheless be such that the employees are not exposed to adverse physical or psychological stress, and so that it is possible to take care of safety considerations.

Aviation is an inherently high-risk industry that relies on stringent procedures and the continuous monitoring of potential hazards.

LT Tech AS provides aircraft maintenance services on behalf of Lufttransport FW AS and Lufttransport RW AS. The nature of aircraft maintenance work carries inherent risks. Tasks are often performed at heights and involve the handling of heavy equipment and machinery. There is a risk of falls or being struck by falling heavy objects. These risks have been mitigated to an acceptable level through rigorous health, safety, and environmental (HSE) procedures and oversight.

Lufttransport FW AS and Lufttransport RW AS are aircraft operators that regularly transport passengers. There is a significant responsibility on pilots, passengers, and other aviation employees to prevent injuries. The consequences of aviation accidents are severe, posing a significant threat to life and health. The aviation sector is subject to strict regulations, and Lufttransport employs a dedicated staff member to ensure compliance with laws and regulations.

Lufttransport has a specific safety manual, the Lufttransport Safety Manual, which serves as a significant safety barrier and reduces risks to an acceptable level.

We have a comprehensive HSE Policy and are committed to continuously reducing risks and preventing accidents in our operations. Lufttransport's overarching policy is that health, safety, and environmental work should be given equal priority to other business activities.

Our primary goal is the elimination of accidents, fire incidents, and work environment-related absenteeism.

The Lufttransport group has procedures in place to identify, correct, and prevent conditions that violate HSE legislation. All employees are responsible for reporting discrepancies. Registered discrepancies are regularly reviewed by management, which implements appropriate measures.

Through these measures, Lufttransport continuously works to reduce risk within its operations.

## Supply Chain

We have suppliers of airplanes and helicopters, as well as parts and technical equipment associated with these. Other natural suppliers in our businesses is hangar owners, suppliers of special tools and equipment, aircraft insurance providers, suppliers of personal equipment as helmets, flight suits, safety equipment etc.

Aircraft and helicopters are composed of numerous small components and materials, sourced from various locations around the world. The production of components for aircraft is typically outsourced to subcontractors, who themselves have extensive supply chains. With a multitude of components, materials, and suppliers, it is challenging to map the entire supply chain; this increases risk, as the information is not readily accessible.

At the component level, several high-risk countries are among the largest exporters. There have been reports of low wages, forced overtime, and anti-union activities in these countries. Electrical components are associated with a high risk for labour rights and human rights violations, particularly in the extraction of conflict minerals. Minerals and metals are extracted in high-risk countries where mining operations present a hazardous working environment, low wages, and the occurrence of child labour.

The manufacturers of airplanes, helicopters, parts, components, special tooling and safety equipment are highly specialised and a limited amount of companies, further they often is granted a specialised approval for the activity as manufacturer of the specific products. The requirements to achieve these approvals are based on trustworthy vendors world wide. The approval of such vendors to airplane and helicopter manufacturers are scrutinised and the accountability and responsibility for this is by the manufacturer and local aviation authorities.

# Actual adverse impacts

No accidents, serious incidents, incidents, or occurrences has been registered regarding NTA requirements in 2023 period.

# Our responsible path into the future

## Whistleblower channels

Luftransport promotes transparency and integrity, and our employees has access to a secure system used for confidential reporting of deviation, incidents and improvement suggestions. For aviation related matters employees and other may also report directly to The Norwegian Civil Aviation Authority or MAA-NOR if desired.

## Implemented measures.

As described, The NTA requires that businesses conduct a human rights and decent working conditions due diligence in accordance with the OECD guidelines for multinational enterprises. This includes not only identifying actual and potential negative impacts, but also implementing measures to manage and mitigate these impacts.

The size and scope of the measures implemented should be proportionate with the company's size, meaning that the bigger the company the more they are expected to implement to manage their impacts.

The legislation and preparatory works encourages companies to use their leverage to create change rather than to severe ties with the supplier.

Luftransport work continuously to comply with the frameworks and standards, by implementing and maintaining the following measures:

- **Conducting human rights due diligence and risk assessments**, using internal and external tools and sources, to identify and address potential issues such as labour rights violations, security risks, community impacts and indigenous peoples' rights.
- **Revised and updated the Supplier Evaluation Form** to include questions regarding human rights and labour conditions. The form now poses detailed inquiries to suppliers about their commitments, standards, policies, and risk assessments. It also encompasses questions about the suppliers' production sites, and any violations of laws or international agreements. Following the revision, the evaluation has adopted a more comprehensive and specific focus on human rights and labour conditions. This change reflects our heightened requirements and expectations of its

suppliers. Following the revision of the Supplier Evaluation Form, Lufttransport anticipates receiving more detailed information concerning the suppliers' adherence to human rights and decent working conditions. Based on the responses to the Supplier Evaluation Form, Lufttransport will assess the risk profile of each supplier. Unsatisfactory responses and procedures related to human rights and indecent working conditions will be addressed by imposing demands on the suppliers.

- **Our monitoring system** is designed to ensure that any deviations in our own operations are detected and resolved within a specified timeframe. Concurrently, we continuously evaluate whether our systems, processes, and tools can be improved to better detect and manage deviations. All reported deviations are thoroughly followed up, and preventative or corrective actions are implemented.
- **All employees receive training** in relevant systems, machinery and equipment use, and protective gear. All employees are required to acknowledge that they have read the HSE handbook. First aid courses are conducted annually, along with chemical handling courses and protective equipment usage training.
- **Engaging** with stakeholders, including workers, communities, governments, NGOs, industry peers and investors, to consult, collaborate and communicate on human rights and sustainability issues, and to advocate for policies that support a just transition to a low carbon economy.
- **Our employees and pilots undergo extensive training and education** each year related to safety, security, aviation, human factors etc.

Oversight within the company's own supply chain and the frequency of such inspections depend on the risk profiles of the various suppliers. The higher the risk of negative consequences for human rights and decent working conditions based on the supplier's risk profile, the more frequent the inspections conducted by the company will be. For instance, more frequent inspections will be carried out on suppliers operating in high-risk industries and countries, whereas inspections will be less frequent for suppliers operating in low-risk industries and countries.

## The Path Forward

In order to gain a better overview of our suppliers and business partners, we are planning to acquire a software system to conduct risk assessments and evaluate potential violations of human rights and labour conditions among our suppliers.

To identify, prevent, mitigate, and account for such risks, Lufttransport wants to follow a 5-step methodology for approaching the work with the Transparency Act. The model is based on the OECD's guidelines for due diligence assessments. The model consists of five steps and lays the foundation for:

- Establishing internal governing routines, along with proper responsibility allocation and mandate
- A clear overview of who the key suppliers and business partners are, and what goods/services the company purchases
- An assessment of which third parties pose the greatest risk
- A structure to monitor the status of the third parties with the highest risk
- A structure to manage information from third parties.

This work has been initiated, and the first step is to embed accountability within the corporation. Our next step is to achieve a satisfactory overview of our suppliers and business partners, to then be able to conduct an adequate due diligence assessment.

## Handling of information access requests

The NTA sets out that anyone, upon written request, has the right to information from an enterprise regarding how the enterprise addresses actual and potential adverse impacts pursuant to NTA Section 4. This includes both general information and information relating to a specific product or service offered by the enterprise.

Lufthtransport will handle information access requests connected to the right of information set out in NTA in accordance with the law requirements.

\*\*\*\*\*

Elektronisk signert:

### **Lufthtransport ADM AS**

Styreleder: Bjørn Kjos

Styremedlem: Tord Wilstrup Torgersen, Per Øyvind Fuglstad, Anna Helene Kjos-Mathisen, Per Andre Rykhus, Tore Kristian Jenssen

Daglig leder: Erlend Høgset Olsen

### **Lufthtransport RW AS**

Styreleder: Thomas Øverli Åsheim

Styremedlem/daglig leder: Erlend Høgset Olsen

**SIGNATURES****ALLEKIRJOITUKSET****UNDERSKRIFTER****SIGNATURER****UNDERSKRIFTER**

This documents contains 14 pages before this page  
Dokumentet inneholder 14 sider før denne siden

Tämä asiakirja sisältää 14 sivua ennen tätä sivua  
Dette dokument indeholder 14 sider før denne side

Detta dokument innehåller 14 sidor före denna sida

authority to sign  
representative  
custodial

asemavaltuus  
nimenkirjoitusoikeus  
huoltaja/edunvalvoja

ställningsfullmakt  
firmateckningsrätt  
förvaltare

autoritet til å signere  
representant  
foresatte/verge

myndighed til at underskrive  
repræsentant  
frihedsberøvende

**SIGNATURES****ALLEKIRJOITUKSET****UNDERSKRIFTER****SIGNATURER****UNDERSKRIFTER**

This documents contains 15 pages before this page

Dokumentet inneholder 15 sider før denne siden

Tämä asiakirja sisältää 15 sivua ennen tätä sivua

Dette dokument indeholder 15 sider før denne side

Detta dokument inneholder 15 sidor före denna sida

authority to sign

representative

custodial

asemavaltuus

nimenkirjoitusoikeus

huoltaja/edunvalvoja

ställningsfullmakt

firmateckningsrätt

förvaltare

autoritet til å signere

representant

foresatte/verge

myndighed til at underskrive

repræsentant

frihedsberøvende