**Disclosure Pursuant to the Transparency Act**

The Transparency Act came into effect on July 1st, 2022. The main objective of the law is to promote businesses' respect for basic human rights and decent working conditions. The Act also ensures that the public has access to information about how businesses manage their human rights risks.

**The Transparency Act obliges us to:**

* Conduct due diligence assessments in accordance with the OECD Guidelines for Multinational Enterprises.
* Account for our due diligence related to human rights and decent working conditions.
* Respond to information requests.

Since the enactment of the law, our main focus has been on anchoring and identifying risks of negative impact on human rights and decent working conditions both within our organization and in our supply chain.

This statement describes our guidelines and procedures for managing risks associated with human rights and decent working conditions, the significant risks we have identified, and measures we have taken as a result of our identified risk areas.

**About Us**

Level Offshore primarily deals with staffing and recruitment. We aim to be positively different, with a goal of creating value for the company, leaders, and employees.

Through our services we strive daily to be significant contributors to decent working conditions. Through sustainability work and analyses, we have identified our positive externalities as creating jobs, giving opportunities to people who are excluded from society, promoting diversity, equality, and safe workplaces.

Our market consists of public and private enterprises in Norway and the UK. We offer services nationwide and have branches in Haugesund and Aberdeen.

Our headquarters is located at Industrigata 25, 5537 Haugesund, and in addition to our outsourced candidates, we have approximately 25 permanent staff at the office.

**How We Work with the Transparency Act**

We are committed to acting responsibly and ensuring respect for basic human rights and workers' rights. This commitment is reflected in our Policy on Human Rights and Decent Working Conditions. In our policies and guidelines, we commit to conducting due diligence. The CEO is responsible for monitoring these commitments and reports annually to the board.

Level Offshore is also approved as a Revidert Arbeidsgiver (Revised Employer), confirming our focus on employer responsibility for outsourced employees. As a Revised Employer, we are audited for the legality of central routines and employment practices. You can read more here. Level Offshore is also a member of NHO Service Staffing Industry, where we commit to adhering to the industry's ethical guidelines. The initiative aims to create security for individual employees and clients and ensure serious conditions in the industry. You can read more here (nhosh.no).

We also have other guidelines emphasizing our views on human rights and decent working conditions. This includes the Employee Handbook, Ethical Guidelines, Policy for Equality and Diversity, Sustainability Strategy, various HSE policies, procurement policy, and privacy policy.

We have the following procedures to manage our human rights risks:

* Ethical Guidelines
* Hiring Procedures
* Salary Determination Procedures
* Employee Follow-up Procedures
* Deviation Handling Procedures
* Internal Control Procedures
* Whistleblowing Procedures
* Risk Assessment

We first conducted a risk assessment to identify areas within our business, among our business partners, and in our supply chain where there is a high likelihood of significant risks for actual or potential violations of human rights and workers' rights.

Our main suppliers were sent a questionnaire about their work with human rights and workers' rights.

The responses received were satisfactory and revealed no specific risks related to human rights and workers' rights.

In connection with the risk assessment, we assessed typical industry risks, geographical risks, company-specific risks, and product/service risks.

Based on the risk assessment, the following significant risk areas were identified:

* The right to a fair wage
* The right to a good working environment
* The right to protection of personal data

We have not identified actual violations of human rights or decent working conditions.

Based on the risk assessment, we have selected the following areas for potential violations of human rights and decent working conditions to prioritize in our work:

1. Decent wage
2. Good working environment
3. Protection of personal data
4. Decent working conditions in the supply chain

**Decent Wage**

A wage according to the tariff is considered a decent wage. There may be a risk that outsourced employees receive lower wages than what is legally required (ref. equal treatment principle). Therefore, we have implemented several preventive and controlling measures. We are audited by an external auditor as a Revised Employer. Through this, there are written procedures for wage determination. We also have monthly internal spot checks where equal pay is determined in collaboration with the customer. We believe that these measures reduce the risk of customers not paying a decent wage and increase the risk of detection.

**Good Work Environment**

Everyone has the right to a good working environment. There may be a risk that outsourced employees have an environment that is not good enough, without our knowledge. We send out an employee survey on forms to our employees, giving our outsourced employees a chance to speak up, even anonymously. We believe that these measures reduce the risk of us not discovering it.

**Protection of Personal Data**

There may be a risk that personal data from our outsourced employees goes astray. We handle large amounts of personal data and, to some extent, sensitive personal data. We have established procedures for handling personal data and any breaches of data protection laws. This includes, among other things, only using a GDPR-secured system for storing personal data and having our internal procedure that describes in detail how we should store and process personal data. We believe that these measures reduce the risk of personal data going astray.

**Decent Working Conditions in the Supply Chain**

Based on a risk assessment, our main suppliers were asked how they work with human rights and decent working conditions. This process gave us better insight. We will prioritize following up with those suppliers who have not yet responded and expand the mapping to more suppliers. We evaluate our suppliers according to ISO9001 and will work to expand the evaluation to include questions about human rights and decent work to a greater extent.

**Summary and the Way Forward**

We will follow up on the implementation and measures initiated as a result of the due diligence process described above. We have set up an internal group that will continuously monitor this work.

Due diligence assessments will be carried out annually, as well as when there are changes in our risk assessments.

For information inquiries, please contact:

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This statement is prepared in accordance with the Transparency Act § 5. The statement applies to the period 01.10.2023 to 01.10.2024.