Report under the Norwegian Transparency Act

2026

AERO
NORWAY
An ITP AERO Company

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1. Introduction

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

Pursuant to Section 4 of the Transparency Act, Aero Norway is required to conduct due diligence assessment to identify actual and potential adverse impacts on fundamental human rights and decent working conditions within its own operations, maintenance activities and supply chain. As a provider of maintenance, repair and overhaul (**"MRO")** services for aircraft engines, Aero Norway relied on a global network of suppliers, contractors and business partners, and is committed to conducting its business in a responsible and sustainable manner.

In accordance with Section 5 of the Act, the findings of the assessments must be presented in an annual due diligence report, no later than 30th of June each year.

This due diligence report describes the due diligence activities conducted by Aero Norway during the period from 1st of July 2025 to 18th of June 2026. The purpose of this report is to provide the public access to the key findings of these assessments, as well as Aero Norway's implemented and ongoing efforts to address and combat any actual or potential adverse impacts.

2. About Aero Norway AS

Aero Norway AS is a Norwegian provider of MRO services for commercial aircraft engines. Headquartered in Sola, Norway, the company serves customer worldwide, including airlines, original equipment manufacturers ("OEMs") and leasing companies.

With its ultimate parent company being privately owned and being a member of ITP Aero Group, a group with worldwide operations, we are committed to responsible business practices, including compliance with the Norwegian Transparency Act, which ensures respect for human rights and decent working conditions.

With extensive technical expertise and a highly skilled international workforce, Aero Norway specializes in delivering high-quality engine maintenance solutions while maintaining a strong focus on safety, reliability, regulatory compliance, and operational excellence. The company operates within a global aviation industry and collaborates closely with a broad network of suppliers, contractors, and business partners across multiple jurisdictions.

Aero Norway is committed to conducting its business in a responsible and sustainable manner. Respect for human rights, decent working conditions, diversity, equality and ethical business practices are embedded throughout the organization and supported by the company's governance framework and compliance program.

Sustainability and environmental responsibilities are integral parts of Aero Norway's operations. By repairing, overhauling, and extending the life cycle of aircraft engine components, the company contributes to reducing waste, conserving resources, and supporting more sustainable aviation operations.

3. Responsibilities and division of tasks

The Board of Directors has the overall responsibility for ensuring that Aero Norway complies with the requirements of the Transparency Act and that appropriate governance and due diligence processes are established within the organization.

The Chief Executive Officer ("CEO") is responsible for the day-to-day implementation of the company's compliance efforts under the Act, including the execution of due diligence assessments and the preparation and publication of the annual due diligence report.

The practical implementation of the company's due diligence processes is carried out across relevant functions within the organization, including Procurement, Human Resources, Compliance, Supply Chain Management with support from executive management where relevant.

4. Aero Norway's conduction of due diligence

4.1. General Statement

This chapter addresses the requirements under Section 4 of the Transparency Act in terms of a duty to conduct due diligence. Aero Norway conducts thorough due diligence based on the OECD Due Diligence Guidance for Responsible Business Conduct. The process is risk-based and includes identifying and assessing risks, implementing mitigation measures, monitoring effectiveness, communicating results and continuously improving due diligence activities. Our due diligence efforts are continuous and aim to address potential risks in our operations and supply chain proactively.

4.2. Due diligence process for customers

4.2.1. Organization

As a provider of MRO services, Aero Norway relies on maintaining high level of trust, integrity and transparency in all business relationships. Sound business ethics and responsible conduct are fundamental to our operations and competitiveness. Aero Norway is committed to conducting business in compliance with applicable laws and regulations and seeks to ensure that its customer relationship does not contribute to adverse impacts on human rights, labour rights, environmental standards, corruption, money laundering, terrorist financing, sanctions violations, or other forms of unethical conduct.

4.2.2. Mapping and assessment prior entering into a contractual agreement

Aero Norway applies a risk-based due diligence process to all customers prior entering into a contractual relationship.

Customer risk classification is based on an internal country risk methodology and consists of two stages: (i) onboarding assessment and (ii) ongoing monitoring and reassessment.

During the onboarding phase, Aero Norway assesses the customer's country of operation, including the location of the customer and its ultimate beneficial owners. The assessment incorporates a range of objective indicators, including:

- International sanctions and embargo regimes;
- Export control considerations;
- Anti-money laundering (AML) and counter terrorist financing (CFT) risks;
- Compliance with fundamental ILO conventions;
- Worldwide Governance Indicators (WGI)
- Corruption Percept Index (CPI)
- Freedom House Index; and
- Membership in the European Convention on Human Rights (ECHR).

Based on the combined assessment of these indicators, customers are classified as low, medium or high risk. This initial classification determines the level of due diligence and monitoring applied throughout the business relationship.

Prior entering into a contractual agreement, Aero Norway conduct an onboarding compliance review for all customers. This review includes screening and verification through third-party databases and compliance tools, including Dun & Bradstreet. The assessment covers sanctions screening, export control considerations, corporate ownership and beneficial ownership structures, financial stability, AML/CFT risk indicators, and other compliance related factors. Where relevant, Aero Norway also assesses customer-facing data protection practices and other legal compliance considerations.

4.2.3. Ongoing Monitoring

Customer relationships are subject to periodic review based on their risk classification.

High risk customers are reviewed at least quarterly, while low-risk customers are reviewed annually. Monitoring activities are supported by automated screening systems that provide alerts regarding significant changes affecting a customer's risk profile, including sanctions exposure, ownership changes, adverse media findings, regulatory actions, or financial instability.

Where significant risk indicators arise, Aero Norway conducts an immediate reassessment to determine whether additional mitigation measures are required. Customer risk classifications may be adjusted over time based on factors including the duration of the business relationship, transaction patterns, financial stability, compliance history, and the result of ongoing monitoring activities.

4.2.4. Identified risks

Through its customer due diligence process, Aero Norway has identified the following potential risks areas:

- Exposure to customers operating in jurisdictions with weak governance, elevated corruption risks, or inadequate protection of human and labour rights;
- Sanctions, export control, and trade compliance risks,
- Money laundering, terrorist financing or other financial crime risks;
- Reputational risks arising from adverse media, unethical business practices, or regulatory violations;
- Risk associated with opaque ownership structure or insufficient transparency regarding beneficial ownership.
- Risks that products or services may be used in a manner inconsistent with applicable laws, regulations or international standards.

No actual adverse impacts on human rights or decent working conditions were identified through customer due diligence activities during the reporting period. However, the above risks remain subject to continuous monitoring.

4.2.5. Measures

To prevent and mitigate identified risks, Aero Norway has implemented the following measures:

- Risk based customer screening and onboarding procedures;
- Enhanced due diligence for customers classified as high risks;
- Ongoing monitoring through automated compliance screening systems;
- Regular assessment of customer risk profiles throughout the business relationship;
- Verification of corporate ownership and beneficial ownership structure;
- Compliance review covering sanctions, export control, AML and CFT requirements;
- Escalation procedures for identified compliance concerns and significant risk indicators;
- The right to suspend, reject or terminate business relationships where unacceptable compliance risks are identified; and
- Continuous improvement of internal compliance procedures, employee training, and monitoring mechanisms.

These measures are intended to ensure that Aero Norway conducts business responsibly and in accordance with applicable legal requirements and internationally recognized standards for responsible business conduct.

4.3. Due diligence process for suppliers

4.3.1. Organization

The aim of the management of purchasing and procurement is to ensure that Aero Norway complies with applicable rules, legislations and internal guidelines when entering into contract.

4.3.2. Mapping and assessment prior entering into a contractual agreement and ongoing monitoring

All suppliers that enter a long-term contractual relationship with Aero Norway are assessed for several risk aspects before entering into a contract, including issues relating to anti-corruption, anti-money laundering, sanction, human rights and financial risk.

The suppliers are assessed regularly during the contract period to defect whether the risk has changed during the contractual relationship.

Aero Norway utilizes Share Control Transparency module to ensure systematic oversight and risk overview of our supplier base. Aero Norway conducts risk-based due diligence of its suppliers. Aero Norway's supplier risk classification is primarily based on country risk indicators, including the Corruption Perception Index (CPI). Suppliers operating in countries with lower CPI scores are subject to enhanced assessment and follow up due to the increased risk of weak governance, corruption and reduced transparency.

The assessment results in an overall categorization of suppliers into risks levels (low, medium and high), which are used to guide further follow-up and mitigation measures.

Where relevant, additional information is collected from publicly available sources and databases, and, where appropriate, through independent evaluations conducted by qualified third parties.

Suppliers assessed as low risk (CPI score in between 60 and 100) are considered to present minimal risk of adverse impact, and no additional measures are deemed necessary beyond standard monitoring. Suppliers assessed as medium risk (CPI score in between 40 and 59) are screened and subject to ongoing dialogue and targeted follow-up to reduce identified risk factors. Suppliers assessed as high risk (CPI score in between 0 to 37) are prioritized for enhanced due diligence, deeper screening and mitigation actions, with the objectives of reducing exposure and improving supplier practices over time.

4.3.3. Identified Risks

Aero Norway continuously works to strengthen its supplier base and reduce the number of suppliers classified in the high-risk category. Aero Norway aims for continuous improvement and long-term alignment of its supplier portfolio with responsible business conduct expectations, while recognizing that changes in global supply chain require a gradual approach.

In 2026 Aero Norway has performed risk assessments of 509 companies. Of these, 5 companies (0.9%) were classified high risk. It is an overarching objective that the entire supplier base should be classified as low risk. However, due to strict regulatory and industry requirements applicable to suppliers, achieving this objective depends on gradual improvement across the value chain over time.

Aero Norway has observed that larger companies are generally better equipped to respond to requests for procedures and guidelines related to due diligence in the value chain. Smaller companies, on the other hand, often have less visibility over their value chains or have not allocated sufficient resources to provide fully satisfactory responses.

During the reporting period, Aero Norway did not identify any actual adverse impacts on fundamental human rights or decent working conditions within is own operations. Supplier assessments identified potential risks associated with suppliers operating in higher risk jurisdictions, but no confirmed instances of actual human rights violations directly linked to Aero Norway's business relationships where identified.

4.3.4. Measures

To mitigate Aero Norway's risk of contributing to human rights and right at work in the supply chain, Aero Norway implements various preventive and concrete measures that are described below.

(1) Contractual terms and conditions

When entering into new supplier agreements, in principle, all suppliers must accept complying with internationally recognized principles relating to human rights, labour rights and environmental protection such as International Labour Organization (ILO) conventions. All goods, products, and services supplied to Aero Norway must be produced and delivered under conditions consistent with these requirements. The standards are based on key United Nations conventions, ILO conventions, and relevant labour laws in the country of production. Where suppliers engage subcontractors, they are responsible for ensuring that these requirements are communicated, implemented and monitored throughout the supply chain.

Aero Norway place significant emphasis on human rights and rights at work in procurement processes before entering into contracts.

(2) Suppliers follow up

Aero Norway's aims to continuously improve visibility across its supply chain to identify potential risks and determine where follow-up measures or supplier engagement are required. As part of its due diligence process, Aero Norway collects and assess information relating to both direct and indirect suppliers, including exposure to higher-risk countries, and evaluates supplier risk based on product categories, management system, and their own due diligence practices.

As part of its due diligence follow-up, Aero Norway has carried out enhanced assessments of suppliers identified as high risk. This has included issuing detailed questionnaires to obtain further insight into supplier practices and potential risk exposure. The information received has been used to assess both actual and potential adverse impacts within the supplier base. When necessary, Aero Norway has implemented follow-up measures, including the termination of eight suppliers' relationships during 2025 and eighteen suppliers' relationship during 2026. These actions have contributed to an improvement in the overall risk picture, reflected in a reduction of suppliers in the high-risk category in 2025 from 31 to 23 and in 2026 from 23 to 5.

(3) High risk supplier management

Suppliers that cannot reasonably be substituted and that are assessed as high risk based on Aero Norway's internal process are required, in addition to providing the necessary documentation, to formally commit to Aero Norway's Code of Conduct confirming that no known adverse impacts are associated with their contractual relationship with Aero Norway.

Supplier risk assessments are conducted on an annual basis. Based on the outcomes of these assessments, Aero Norway evaluates the need for reclassification and requests supplementary documentation where relevant. Where appropriate, this may result in enhanced due diligence measures, targeted supplier engagement, or the termination and replacement of the supplier relationship.

4.4. Aero Norway's due diligence within its own organization

4.4.1. Responsibilities

At the heart of Aero Norway are the people who makes it all possible. At year-end 2025 Aero Norway has 220 employees representing a wide range of nationalities, forming a diverse and international workforce.

Responsibility for human rights and working conditions at Aero Norway is distributed throughout the organization. The Board of Directors reviews policies and oversees overall compliance, as reported by management. They ensure policies maintain relevance and effectiveness in upholding Aero Norway's ethical standards and business integrity.

Health, Safety and Environment (HSE) is a key focus aera for Aero Norway and plays an important role in ensuring sustainable operations and compliance with all applicable regulations, internal procedures, and industry requirements. Our duties include fostering a culture of compliance, appointing compliance monitors, allocating resources and effectiveness in upholding Aero Norway's ethical standards and business integrity.

4.4.2. Policies and governing documents

Aero Norway has implemented a range of policies and governing documents to support human rights and decent working conditions. Aero Norway's Code of Conduct acts as a cornerstone of the company's commitment to ethical conduct and responsible business practices, setting forth the behavior standards expected of Aero Norway and its employees.

In addition to the Code of Conduct, Aero Norway has a range of guidelines aimed at protecting and supporting human rights, combating corruption, discrimination, and all forms of forced labour.

4.4.3. Training and awareness

Aero Norway recognizes that effective implementation of its policies and procedures requires employee awareness and competence. Employees receive relevant training and information regarding the company's Code of Conduct, health and safety requirements, workplace rights, ethical business conduct and applicable compliance obligations.

Training activities are integrated into employee onboarding processes and supplemented through internal communications, management engagement, HSE activities and department-specific training programs. Aero Norway continuously works to strengthen awareness of responsible business conduct and the principle underlying the Transparency Act throughout the organization.

Employees with specific responsibilities within procurement, supplier management, compliance and human resources receive additional guidance and support relevant to their areas of responsibility.

4.4.4. Activities to identify negative human rights impact

Aero Norway is committed to maintaining a safe, healthy and inclusive working environment and continuously evaluates measures to prevent adverse impact on employee's health and working conditions. Trends related to sick leave and reported occurrences are regularly reviewed and discussed within the Working Environment Committees (AMU) and management.

Aero Norway has competent and engaged Safety Representatives (SR) across the organization, actively participating in AMUs and various improvement initiatives. AMUs are established within the organization to ensure employee involvement and oversight of HSE matters. Employees have access to relevant HSE information, including SR and AMU membership details, meetings minutes, reports, and other HSE documentation through the company's internal communication platforms.

At Aero Norway, transparency and employee involvement in decision-making processes are fundamental principles. Regular meetings are held with employee representatives and unions to maintain high standards and ensure continuous dialogue. In addition, annual meetings are conducted with all Safety Representatives to address key HSE topics and share best practice across the organization. Employees are also represented at board level within Aero Norway, ensuring that employee perspectives are included in strategic discussions.

The People Engagement Survey conducted in 2025 measures employees' perception of respect, inclusions as well as job satisfaction. The survey is conducted on an annual basis with the purpose of collecting evidence-based input to help the company understand how to continuously improve the work environment, quality of work, employee's wellbeing and organizational effectiveness.

4.4.5. Activities to prevent and mitigate negative human right impact

(1) Handling information requests

According to the Transparency Act, Aero Norway has set up a process for receiving and managing requests for information following Section 6 of the Act (Right to Information).

Requests for information should be submitted by email send to compliance@aeronorway.no. Aero Norway will answer to those inquiries within three weeks, as required by Section 6 of the Transparency Act.

(2) Occupational health and employee wellbeing

Aero Norway place significant emphasis on safeguarding employees' health and wellbeing. The sickness absence rate in 2025 was 4.7%, Aero Norway continues to focus on preventive health measures, workplace safety, reducing ergonomic risks and preventing work-related musculoskeletal disorders. All employees were offered ergonomic training through the company's Occupational Health Service, and ergonomic awareness continues to form part of the onboarding program for new employees.

As an additional preventive health measure, Aero Norway offered influenza vaccinations free of charge to all employees. This initiative was implemented in cooperation with the Occupational Health Service and aimed at supporting employees' wellbeing and reducing sickness absence.

(3) Diversity, inclusion and equal opportunities

Aero Norway is committed to promoting equal opportunities, diversity and inclusion throughout the organization. The company seeks to ensure that all employees are treated fairly and with respect and are provided with equal opportunities for development, career progression and participation in decision-making processes.

In accordance with Aero Norway's guidelines, the company works to promote gender equality and to ensure full and effective participation and equal opportunities for leaderships at all levels of the organization. Aero Norway's objective is that the proportion of women in leadership positions should reflect the proportion of women employed within the company.

At the end of 2025, women represented 17% of leadership positions, exceeding the company's target of 15%. Aero Norway will continue to promote equal opportunities through fair recruitment, development and promotion processes and by fostering an inclusive working environment for all employees.

(4) Risk Management and prevention of workplace hazard

To strengthen systematic risk management, Aero Norway introduced dedicated Risk Management and Management of Change (MOC) process across the organization. Risk assessments and change management processes have been implemented in multiple departments and are used to identify, assess and mitigate potential risks to employees, operations and working conditions.

(5) Health, safety and incident reporting

Aero Norway maintains a dedicated Health, Safety and Environment reporting system through which employees can report actual or potential hazards, safety concerns, and operational risks. The system supports the identification of adverse impact, facilities corrective actions, and contributes to continuous improvement of workplace safety and operational integrity.

(6) Safety management and continuous risk assessment

Aero Norway continues to strengthen its Safety Management System through ongoing hazard identification activities and systematic risk assessments. Particular emphasis is placed on identifying, evaluating and mitigating workplace safety risks that may affect employees' health, safety and working conditions.

(7) Safety and healthy working environment

During 2025, Aero Norway continued to invest in workplace facilities and infrastructure to support a safe and healthy working environment. Measures included improvements to employee welfare facilities and the ongoing modernization of ventilation systems, contributing to employees' comfort, health and workplace wellbeing.

Safety is a top priority in all the operations with, extending to our suppliers and prioritizing the well-being of our employees. We adhere strictly to safety procedures, quality standards, and regulations, working on maintaining a culture of continuous learning and improvement. Aero Norway maintains zero tolerance for reckless behavior or deliberate violation of safety requirements.

As part of our commitments to employee health and safety, we continue to improve the management of hazardous materials and waste. Through careful chemical purchasing procedures, substitution of hazardous substances where feasible, improved waste segregation and investments in waste reduction technologies, we seek to reduce risks to employee and minimize environmental impacts associated with our operations.

(8) Responsible governance and sustainable business conduct

Aero Norway is committed to conducting business responsibly and sustainably. This commitment includes responsible governance, respect for internationally recognized human rights, safe and healthy working conditions, ethical business practices, and continuous improvement of environmental performance. The due diligence activities described in this report form an integral part of Aero Norway's efforts to prevent adverse impact and promote responsible business conduct throughout its operations.

(9) Continuous improvement

Aero Norway will continue its efforts in 2026 to identify areas for improvement, implement preventive measures, and further strengthen health, safety, environmental, and human rights' performance across all areas of its business.

5. The way forward

Aero Norway is committed to continuously strengthening its work on human rights and decent working conditions in accordance with the Transparency Act. Our priorities for the coming years include:

- Continuing to assess and monitor human rights and labour rights risks within our own operations and supply chain.
- Strengthening supplier due diligence processes and ensuring that suppliers adhere to our expectations regarding human rights, working conditions, health and safety and ethical business conduct.
- Maintain a safe, healthy and inclusive working environment for all employees, contractors and visitors.
- Promoting equal opportunities, non-discrimination and respect for diversity throughout the organization.
- Continuing employee awareness and training activities related to ethical conduct, workplace rights, health and safety and reporting concerns.
- Maintaining effective channels for employees and external stakeholders to raise concerns regarding potential human rights or labour rights violations.

- Reviewing and improving our due diligence processes on regular basis to ensure compliance with applicable legislation and evolving best practices.
- Continue strengthening grievance mechanisms and stakeholder engagement to ensure concerns relating to human rights and decent working conditions can be identified and addressed at an early stage.

6. How to request information from Aero Norway

Aero Norway encourages employees, suppliers, customers and other stakeholders to raise concerns or questions relating to human rights, decent working conditions and responsible business conduct. Such inquiries may be submitted to compliance@aeronorway.no and will be handed in accordance with Aero Norway's internal procedures.

[Signature to follow]

Alan Jones
(Chair)

Eva Guil
(Director)

Carmen Otero
(Director)

Neil Russell
(Director)

Sindre Hermansen Lea
(Board Member)

Kjetil Mo Romarheim
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Susanne Lindholm-Storvik
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