



SEC NORGE

TRANSPARENCY

REPORT 2026

Administration

SEC Sp. z o.o.

Twarda 12, 80-871 Gdańsk, Poland | VAT: PL5833243574
+48 58 550 70 66 | info@secgrupa.com | www.secgrupa.com

Norwegian market

SEC Norge AS

Kårevikstølen 47, 5412 Stord, Norway
Org no. 898 125 882

KEY CHANGES SINCE THE PREVIOUS REPORT	3
INTRODUCTION.....	3
ABOUT THE REPORT	3
ABOUT THE COMPANY	3
BUSINESS ACTIVITIES.....	3
STRUCTURE.....	4
GOVERNANCE AND RESPONSIBILITIES.....	5
SUPPLY CHAIN - SUPPLIER SELECTION	5
POLICIES AND PROCEDURES	6
HUMAN RIGHTS	6
FORCED LABOR.....	7
CHILD LABOR	7
MIGRANT LABOUR	7
WAGES AND WORKING TIME.....	7
ANTI-DISCRIMINATION	8
ANTI-HARASSMENT	8
REPORTING AND GRIEVANCE MECHANISM	9
EMPLOYEE WELL-BEING	9
FREEDOM OF ASSOCIATION	9
HEALTH AND SAFETY.....	9
TRAINING	10
ENVIRONMENTAL IMPACT	10
TRANSPORTATION AND LOGISTICS	11
PREMISES	11
SUPPLY CHAIN.....	11
THE HUMAN RIGHTS RISK ASSESSMENT (HRRR) PROCESS.....	12
HUMAN RIGHTS DUE DILIGENCE	13
RESPONSIBILITY INTEGRATED INTO GOVERNANCE AND POLICIES	13
CONSIDERATION OF RISKS IN OPERATIONS.....	13
IMPLEMENTATION OF MITIGATION MEASURES	13
MONITORING OF MITIGATION MEASURES	13
REPORTING AND AUDITS.....	13
SUMMARY OF THE SYSTEM.....	14
DEVELOPMENTS DURING THE REPORTING PERIOD	14

Key changes since the previous report

- Implementation of new internal procedures (PR11-PR14)
- Introduction of new policies, including remuneration and anti-corruption policies
- External audits performed (Impactt, Aker Solutions) - no non-conformities identified
- Development of the employee training system and training planning
- Introduction of a structured supplier assessment process (including CSR aspects)
- Implementation of Business Continuity Plan (BCP) (in progress)
- Establishment of a training center within the SEC Group and obtaining additional ISO 9001 certification covering training-related activities
- Further development of internal management system, including risk management and compliance processes

Introduction

About the report

SEC Norge AS ("SEC") fully recognizes the purpose of the Norwegian Transparency Act (Åpenhetsloven), which is based on the obligation to conduct due diligence assessments with regard to human rights and socially responsible business practices - both within its own operations and throughout the supply chain.

This report relates to **SEC Norge AS (registration number: 898 125 882)** and covers the company's operations during the reporting period.

It has been reviewed and approved by the Board of Directors on **19 June 2026**.

The report is a continuation of reports published in previous years and reflects the ongoing development of the organization in terms of transparency and responsibility.

The information presented is based on internal data, documentation, and management processes in place within the organization.

Where relevant, certain elements refer to initiatives implemented at the SEC Group level.

The English version of the report constitutes the official and binding version.

An unofficial Norwegian translation may be provided for convenience only. In case of any discrepancies, the English version should be considered the most accurate.

About the company

Business activities

SEC Norge AS specializes in personnel leasing, providing qualified, competent, and experienced workers. We support our clients in managing workforce shortages and securing their investments.

We offer the leasing of engineering and managerial staff in the **shipbuilding and**

energy sectors, as well as support in auxiliary services.

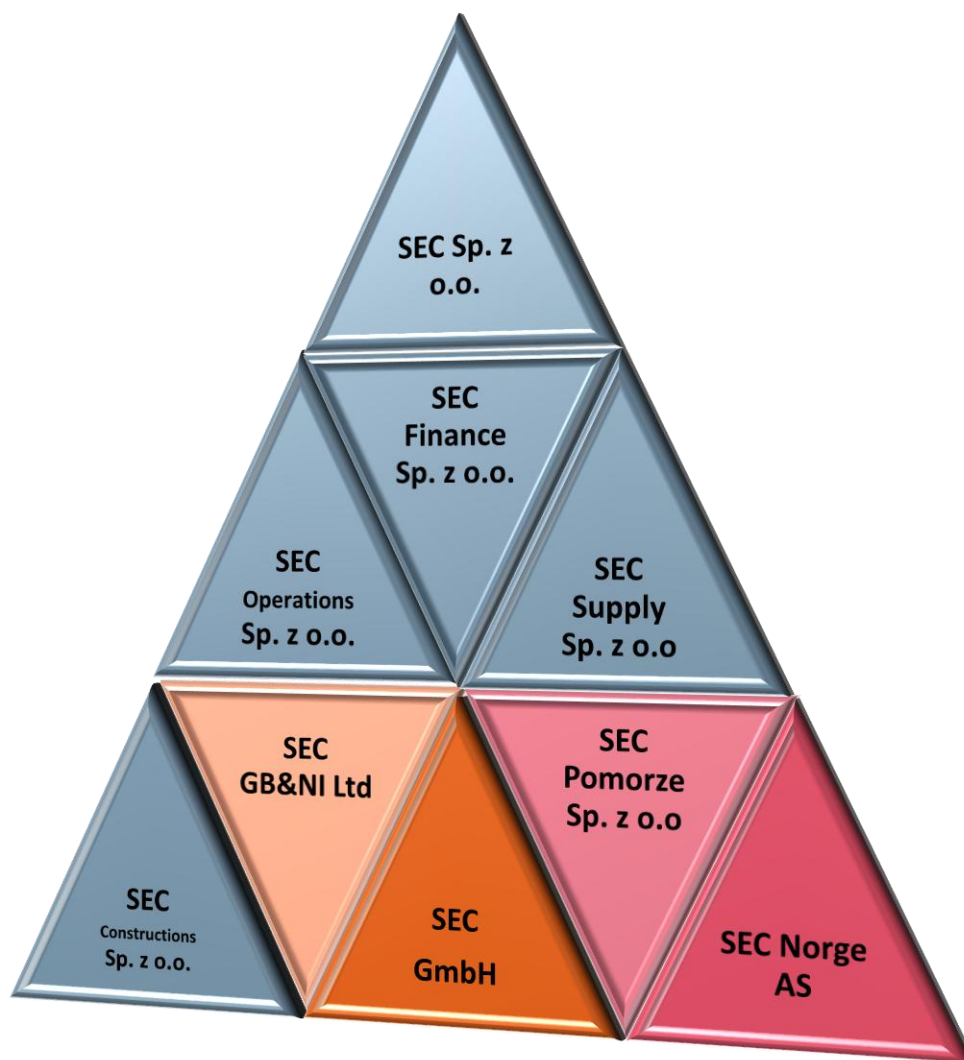
We serve both public and private sector clients **in Norway, Germany, the United Kingdom, and Poland**. Our services are delivered throughout Norway, with offices located in **Stord and Gdańsk**.

Every day, we strive to make a meaningful contribution to the creation of **decent working conditions**. We are committed to implementing new practices and attitudes that enable us to effectively manage and minimize the impact of our operations on people and the environment.

Structure

SEC Norge AS is a Norwegian subsidiary belonging to the SEC Group, whose ultimate parent company is **SEC Pomorze Sp. z o.o.** based in Gdańsk.

Operational and management processes are carried out within the SEC Group, with the participation of the entities forming part of it.



Governance and responsibilities

The SEC Management Board is actively engaged in ensuring compliance with human rights and oversees the fulfillment of obligations arising from the Norwegian Transparency Act (*Åpenhetsloven*). We are also committed to adhering to the principles outlined in our **Corporate Social Responsibility**.

(CSR) Policy.

The Board conducts an **annual review and evaluation of the Integrated Management System** to ensure its relevance, proper documentation, and continuous improvement. This process incorporates findings from internal and external audits, action plans addressing identified risks and opportunities, as well as analysis of system documentation.

A system for monitoring key performance indicators (KPIs) is in place within the organization and is used to support management and assess process performance.

Body	Responsibilities
Management Board	Oversees the strategic direction of the company and ensures sound corporate governance.
Executives	Responsible for implementing the company's goals and strategy, ensuring that operational activities comply with established policies and procedures.
Management Representative for the Integrated Management System (IMS Officer)	Responsible for maintaining and developing the Integrated Management System, including organizing audits, conducting due diligence activities, and cooperating with management in the areas of quality, occupational health and safety, and environmental protection.
Project Coordinator	Collaborates with management to ensure alignment with implemented strategies and identifies areas for improvement in terms of social responsibility.

Supply chain - Supplier Selection

The SEC supply chain primarily includes administrative, legal, and transportation services. Additionally, our suppliers provide the delivery and maintenance of personal protective equipment. Over 95% of procurement-related costs are incurred in Poland, with the remaining portion in Norway. For smaller orders, such as office space rental, we rely on local service providers.

SEC carefully selects its business partners, expecting them to adhere to the highest ethical standards. We require compliance with applicable laws, avoidance of conflicts of interest, environmental responsibility, and a commitment to fair working conditions.

The supplier prequalification process and approval of subcontractors constitute a key element in ensuring compliance with the Norwegian Transparency Act requirements. These processes are supported by procedures related to supplier and supply chain management.

Supplier assessments are conducted with respect to selected partners, particularly those relevant to operational activities. Certain services, such as air transport or

accommodation, are not subject to the same requirements due to the nature of the cooperation.

Suppliers subject to verification are required to comply with defined standards, including acceptance of relevant declarations and cooperation principles.

Policies and procedures

SEC adheres to widely recognized principles of business ethics and international guidelines, such as the Universal Declaration of Human Rights, the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

This commitment is reflected in SEC's policies, which include corporate guidelines on key aspects of human rights, such as:

- Freedom of employment
- Freedom of association
- Prohibition of child labor
- Fair wages and transparent working time regulations
- Prohibition of discrimination and harassment
- Occupational health and safety

All of these principles, which reflect our approach to human rights and decent working conditions, are incorporated into the SEC Code of Ethics, the CSR Policy, and relevant health and safety policies and procedures.

During the reporting period, additional procedures and policies were implemented to improve internal processes and adapt the organization to current operational and legal requirements.

The new procedures include, among others:

- informing employees about changes,
- pay and promotion equality,
- handling of personal incidents in project execution,
- supplier and supply chain management.

Additionally, selected policies were introduced or updated in the following areas:

- information security and personal data protection,
- remuneration and promotion,
- anti-corruption,
- reduction of pay inequalities.

These implementations are based, among others, on conducted analyses, audits, and ongoing organizational needs.

Human rights

Human rights include, among others, the right to freedom from slavery, oppression, coercion, forced labor, and child labor, as well as the right to health protection and decent working conditions.

Our approach to human rights is based on internationally recognized standards and a commitment to maintaining and developing effective mechanisms to prevent all forms of mistreatment of individuals.

Forced Labor

SEC strongly condemns all forms of modern slavery and does not tolerate, support, or permit any practices involving the exploitation of workers through force, threats, deception, abduction, or coercion.

At SEC, we believe that work must be performed voluntarily. **Every employee has the right to terminate their employment with reasonable notice and without incurring any penalties. Furthermore, employees must not bear any costs related to the recruitment process.**

Child Labor

At SEC, we strongly oppose the use of child labor and consider it a serious violation of human rights. Companies that employ children or tolerate such practices within their supply chains expose themselves to significant risks, including reputational damage, legal consequences, and violations of applicable laws.

SEC does not tolerate child labor and has implemented appropriate preventive procedures. We require candidates to provide documentation confirming their age and professional experience. Children under the age of 15 cannot be employed by SEC, [in accordance with applicable legal requirements and international standards, including ILO Convention No. 138.](#)

Young workers (under the age of 18) are not assigned to hazardous tasks that could endanger their health, safety, or interfere with their education—including overtime or night shifts. In practice, SEC currently does not employ anyone under the age of 18.

We also require our suppliers to have effective systems in place to prevent child labor. In the event of suspected or confirmed violations, SEC reserves the right to immediately cancel orders and terminate business relationships.

Migrant Labour

Migrant workers are often perceived as temporary employees whose task is to complete a job and return to their country of origin. At SEC, **we pay particular attention to the risk of exploitation faced by both local and migrant workers.**

Our workforce consists primarily of Polish nationals, who represent the largest group of migrants in Norway.

All migrant workers are afforded the same employment protection and rights as local employees, insofar as this is consistent with applicable law.

Wages and Working Time

We are committed to ensuring pay equity and apply proven practices in this area. Contracts concluded with clients include provisions regarding **employment conditions and equal treatment of workers.** Before starting cooperation, we agree on details such as **work schedules, wages, bonuses, holiday entitlements,** and additional benefits such as transport or accommodation.

Working time data is reported weekly, and employees receive **at least the statutory minimum wage,** paid directly. Each payment is accompanied by a payslip containing information on hours worked and amounts due.

Every employee has the right to raise concerns or comments regarding pay conditions and equal treatment—directly to their supervisor, to the HR and payroll department, or via email or phone.

Anti-discrimination

At SEC, we believe that inclusivity¹ and diversity are fundamental to competitive success. Employers have a duty to prevent discrimination in the workplace.² In recruitment processes and career development, we apply the principles of **non-discrimination and equal opportunity**.

The only criteria for evaluating candidates are experience, education, and knowledge. Factors such as gender, race, social background, marital status, ideological beliefs, religion, or kinship are entirely excluded from the professional assessment process.

The industry in which we operate is characterized by a low representation of women; therefore, we **take action to reduce this imbalance** and actively promote anti-discrimination efforts.

The likelihood of cultural discrimination is assessed as low, as the SEC team consists **almost entirely of Polish nationals**. Nevertheless, we make every effort to **prevent all forms of discrimination**, both within the organization and in relations with external partners.

Any employee who has experienced or witnessed discrimination has the right—and indeed the obligation—to report it to the employer.

Anti-harassment

SEC does not tolerate violence, harassment, abuse, or any form of coercion, including physical, verbal, sexual, or psychological. **All employees must be treated with respect and dignity.** Any form of torture or cruel, inhuman, or degrading treatment is unacceptable, including threats of violence, corporal punishment, sexual violence, unjustified restrictions on freedom of movement in the workplace or accommodation, as well as arbitrary detention.

This commitment is reflected in our **Corporate Social Responsibility Policy**. To prevent harassment, **whistleblowing and grievance mechanism** has been implemented, and the company is committed to **monitoring employee relations and investigating all reported complaints and grievances**.

The reporting channel is intended to prevent harassment by providing access to a clear procedure and tools for reporting incidents of harassment, including sexual harassment. **The company is committed to thoroughly reviewing every report.**

¹ Inclusiveness as an organizational culture involves creating a tolerant workplace environment, that promotes acceptance and integration and prevents discrimination and conflicts. It fosters creativity and innovation by respecting diverse perspectives, experiences, and skills. Promotes mutual respect and understanding, reducing the risk of legal disputes.

² Lov om likestilling og forbud mot diskriminering (likestillings- og diskrimineringsloven)

Reporting and Grievance Mechanism

As part of **the internal reporting mechanism**, several communication channels are available. Concerns can be reported either by name or anonymously—**by phone, traditional mail, email, or via an online form.**

For matters concerning the relationship between employee and employer, reports can be submitted directly to a supervisor or to the HR and Payroll department.

The form available on our website allows anyone to report violations. The platform is secure and enables whistleblowers to remain fully anonymous. It is used to report, among others, the following situations (this list is not exhaustive):

- Creating a hazard in the workplace
- Discrimination
- Harassment, bullying, or intimidation
- Fraud
- Theft
- Corruption
- Violations of competition law
- Inappropriate personal conduct
- Abuse

All employees have the right to report their concerns confidentially and anonymously, without fear of retaliation.

Employee well-being

Employee well-being and job satisfaction constitute an important part of SEC's organizational culture.

The organization undertakes measures aimed at ensuring appropriate working conditions, supporting employee relations, and fostering an environment conducive to engagement and development.

As part of these activities, initiatives are implemented to support communication, competency development, and the monitoring of employee satisfaction levels.

Freedom of association

The role of trade unions is to protect workers' rights and actively contribute to the creation of decent and safe working conditions. SEC has signed agreements with both **Fellesforbundet** and **Forbundet for Ledelse og Teknikk (FLT)**.

The vast majority of our employees are members of one of these trade unions, which reflects a high level of organization and engagement in social dialogue.

Health and Safety

SEC makes every effort to ensure healthy, safe, and decent working conditions for all employees. Our **Occupational Health and Safety Management System**, certified in accordance with **ISO 45001:2018**, provides a comprehensive framework for addressing evolving health and safety risks.

The system's objectives include:

- ensuring a safe and healthy working environment,
- preventing injuries and occupational illnesses,
- improving employee health and performance,
- providing adequate resources to fulfill these commitments.

Since **leased employees perform their work at client sites**, where conditions may vary, we conduct **comprehensive risk assessments** and implement corrective measures both **before initiating sales activities and after working conditions are established**.

We actively monitor the work environment by organizing regular on-site meetings, maintaining ongoing communication with trade unions and HSE representatives, and conducting regular monitoring activities related to working conditions and employee relations.

Since 2018, SEC has had a **designated safety representative**, and in 2023, a **Working Environment Committee (AMU)** was established, confirming our growing commitment to occupational health and safety. Employees are also provided with the **necessary personal protective equipment**.

The organization applies a **workplace policy prohibiting alcohol and narcotic substances**. Its objective is to ensure safe working conditions and reduce risks associated with work activities. The policy includes preventive measures and controls, and in cases of violations, appropriate actions are taken in accordance with applicable procedures.

Training

At SEC, we fully understand how essential continuous skill development is to unlocking the full potential of our employees. We ensure that our specialists are well-prepared to carry out their assigned tasks.

Employees also gain valuable experience while working at our clients' sites, which often includes participation in training and the practical development of competencies.

Training activities at SEC include both professional competency development and training in the areas of occupational health and safety, management, and work organization.

Training is delivered in various forms, including internal training, practical activities, and online materials, depending on organizational needs and the nature of the projects carried out.

The development of training activities is supported at the SEC Group level, including through a dedicated **training center**.

Environmental impact

SEC's operations impact the natural environment primarily in an indirect manner, through the leasing of employees to carry out client projects. **The environmental impact resulting from these projects is reported independently by the clients.**

As for other aspects of our operations, **SEC has identified three main areas of environmental impact: transport and logistics, facility management, and the supply chain.** These are the areas where we focus our efforts to reduce the company's environmental footprint.

The organization uses indicators to assess environmental impact and the effectiveness of implemented measures.

In particular, areas related to resource consumption, such as electricity and water usage, are monitored based on operational and billing data.

This monitoring is linked to established environmental objectives, including the reduction of resource consumption and the development of good environmental practices, such as the use of digital solutions, waste reduction, and responsible use of materials.

Transportation and logistics

Our employees travel to and from client projects on regular rotations. All travel arrangements are handled by the **SEC (Supply)** department, which is responsible for tasks such as booking tickets while ensuring route **optimization and logistical efficiency.**

Journeys typically begin at the employee's place of residence abroad, and **most travel is carried out via regular commercial flights.** When necessary, the company also provides **local transportation** on site.

Premises

The environmental impact associated with facility use primarily concerns the generation of municipal waste, energy consumption, and water usage. This includes premises used as offices, warehouses, and employee housing. **SEC actively monitors these factors** with the aim of reducing them.

As part of our efforts to reduce environmental impact, **energy-efficient LED lighting and motion sensors have been installed.** Additionally, **we practice waste segregation and follow the RRR principle: Reduce, Reuse, Recycle,** which promotes waste reduction, reuse, and recycling.

In 2025, SEC almost completely eliminated the purchase of bottled water for office staff. Instead, a **water dispenser** was installed in the office, **significantly reducing plastic waste.**

Supply chain

The supplier due diligence process did not reveal any indications of child labor, forced labor, pay inequality, restrictions on freedom of association and collective bargaining, or threats to health and safety. None of the assessed suppliers were identified as posing a significant risk of such adverse impacts.

As a result, no major risks were identified that would require actions beyond the existing preventive measures.

The risk assessment among SEC's suppliers takes into account the fact that **we primarily source from countries and industries with a relatively low level of risk** in the context of our operations. **These suppliers operate within legal systems that protect fundamental human rights and ensure decent working conditions.**

During the reporting period, the approach to supplier evaluation was further refined, taking into account the level of risk and the relevance of a given entity to operational activities.

Additional requirements are applied to selected key suppliers, including a commitment to comply with social responsibility standards through appropriate declarations.

The scope of these requirements is adjusted to the nature of cooperation, particularly considering types of services where formal verification is not appropriate.

The Human Rights Risk Assessment (HRRR) process

Risk assessment is one of the key tools used across various areas of SEC's operations, including sustainability, regulatory compliance, personal data protection, supplier information security, and business criticality.

Risk analysis is conducted regularly and in response to specific events. Potential risks are identified at the initial assessment stage and then subject to detailed analysis in selected areas. Risk prioritization is based on the analysis of causation, the severity of impact, or the direct linkage to operations, allowing the organization to focus on areas with potentially higher risk.

This process also addresses the potential impact of operations on human rights, in line with due diligence principles.

Human rights-related risks are taken into account in decision-making processes, in particular in:

- engagement with new clients,
- selection and verification of suppliers and business partners,
- execution of projects at client sites, including the assessment of working conditions and work organization,
- analysis of work arrangements, including working time and employment conditions,
- identification of potential risks related to employee relations.

Human Rights Due Diligence

Responsibility integrated into governance and policies

SEC's approach to human rights due diligence is based on the principles defined in the Corporate Social Responsibility (CSR) Policy, which sets standards for conduct in relations with employees, clients, suppliers, and other stakeholders.

Consideration of risks in operations

Human rights considerations are integrated into day-to-day operations, in particular in relation to cooperation with clients, suppliers, and the organization of work.

Implementation of mitigation measures

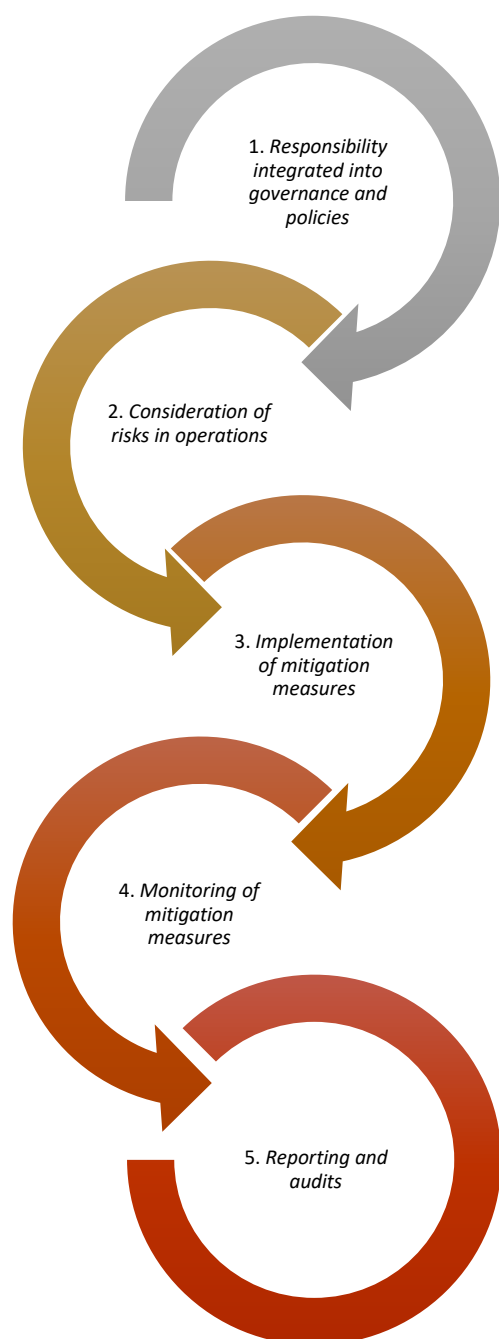
The organization applies internal policies and rules of conduct approved by Management and made available to employees. These form the basis of daily operations and include, among others, the prevention of discrimination, harassment, and forced labour.

Monitoring of mitigation measures

The application of these principles is monitored internally through ongoing supervision, grievance mechanisms, and the analysis of reported signals.

Reporting and audits

Compliance with the adopted principles is also verified through internal and external audits. The organization maintains ISO-certified management systems which are subject to regular surveillance audits.



Compliance with the adopted principles is verified through internal and external audits.

The organization maintains certification in accordance **with ISO 9001, ISO 45001, and ISO 14001** standards, and the management system is subject to regular surveillance audits, ensuring continuous oversight and improvement.

Additionally, as part of cooperation with clients, the organization may be subject to external assessments covering human rights and working conditions. In cases where irregularities are identified, appropriate actions are taken.

Summary of the system

SEC has implemented and maintains a management system in the area of human rights and working conditions in line with the requirements of the Transparency Act.

Within the functioning system:

- responsibility for implementing obligations arising from the Act has been assigned to the management board and Norwegian entities within the SEC Group,
- system documentation is in place, including:
 - SEC CSR Policy,
 - SEC Code of Conduct and Ethics,
 - a whistleblowing and grievance mechanism,
 - purchasing contract templates including compliance requirements,
- a supplier qualification and evaluation process is in place, taking into account human rights and working conditions,
- supervision over employment conditions and remuneration is carried out, including for subcontractor personnel working on projects in Norway,
- oversight of compliance is carried out within the organization, and key issues are reported to senior management.

Based on the functioning system and conducted analyses, SEC assesses the risk of human rights violations and deterioration of working conditions as relatively low.

Developments during the reporting period

During the reporting period, SEC implemented and further developed a number of new solutions and documents strengthening the existing system:

- new internal procedures were introduced:
 - PR11 - Informing employees about changes,
 - PR12 - Pay and promotion equality,
 - PR13 - Personal incidents handling in project execution,
 - PR14 - Supplier and supply chain management,
- new elements of system documentation were introduced:
 - Information Security Policy (including personal data protection),

- Remuneration and Promotion Policy,
 - Pay Gap Action Plan,
 - Anti-Bribery, Anti-Corruption and Fraud Prevention Policy,
- a legal requirements register was implemented, covering Norwegian, EU, and Polish regulations, supporting ongoing compliance assessment,
- the approach to risk assessment was further developed and expanded, including in the areas of stakeholders and information/data security,
- the supplier qualification and evaluation process was expanded to include additional requirements, including confirmation of social responsibility principles by selected key suppliers,
- external audits (Impactt and Aker Solutions) were conducted and did not identify any significant non-conformities in the area of human rights and working conditions,
- the approach to pay equality was further developed - no pay gap for comparable positions was confirmed, and reporting in this area will be conducted on a regular basis,
- the reporting approach within IMS/QHSE was enhanced by introducing cyclic (semi-annual) system reviews,
- training centre was established and the training management system was expanded, including a training register and training plan,
- the Business Continuity Plan (BCP) continued to be developed, with implementation still in progress,
- employee surveys were conducted covering working conditions, communication, and cooperation with supervisors - the results confirm a high level of satisfaction and a very positive assessment of working conditions and relationships with supervisors,
- employee information materials (FAQ) were expanded and made available online, covering topics related to employment conditions and work in Norway,
- activities in the area of information security were expanded, including the registration and analysis of phishing attempts and other IT-related incidents.

The implemented measures represent a further development of the existing system and an adjustment of the organization to increasing client requirements and the regulatory environment.

SEC remains committed to further developing its due diligence approach and maintaining high standards in the area of human rights and working conditions.

SEC continuously develops its approach to due diligence and remains committed to maintaining high standards in the area of human rights and working conditions.

The solutions implemented and developed within the organization support a structured and responsible approach to operations, both in its own activities and throughout the supply chain.

This approach enables SEC to remain a reliable and transparent partner for its clients, while consistently adapting to evolving regulatory and operational requirements.