

Norwegian Transparency Act Statement 2022

The scope of this statement covers all our operations worldwide, including those of our subsidiaries.

About Sulzer

Sulzer holds leading positions in its key industrial markets of oil and gas, power, water, and general industries, where its global operations fall within three divisions:

Flow Equipment: leading global pump manufacturer with manufacturing footprint encompassing more than 20 sites, together with a network of sales offices.

Services: leading independent service provider for all types of rotating equipment including turbines, pumps, compressors, generators, and motors with a global network of service centres.

Chemtech: leading player in the fields of process technology and separation towers and two-part mixing and dispensing systems.

More: [About Sulzer](#)

Our principles and policies

Sulzer is committed to being open and transparent about how we conduct our due diligence and promote fundamental human rights and decent working conditions. Furthermore, Sulzer is committed to the elimination of modern slavery and human trafficking within our business and our supply chain. Sulzer's Procurement function directs our activities and our relationships with suppliers in accordance with many internal and external ethical guidelines. These guidelines and policies serve as a point of reference for upholding fundamental human rights as well as working conditions, occupational health and safety, business ethics, and environmental law. The policies are reviewed regularly to ensure they remain relevant and fit for purpose in a market leading global company. They include:

- **Code of Business Conduct (CoBC):** This code explains the manner in which we behave as an organization and how we expect our employees to act. It includes a commitment to comply with all employment and labour laws, including those related to the elimination of all forms of forced and compulsory labour (including child labour). We require all employees to sign the CoBC.
- **Recruitment Policy:** We operate a robust employment policy, including conducting eligibility to work in a particular location and checks for all employees and contractor provided personnel to safeguard against human trafficking or individuals being forced to work against their will in high-risk areas.
- **Whistleblowing Policy:** We operate an independently provided whistleblowing procedure where all employees know and are made aware that they can raise concerns without fear of reprisals about the treatment of colleagues or of practices within our business or supply chain.
- **UN Global Compact:** We are a longstanding signatory to the United Nations Global Compact and support its drive for human rights and social dimension of corporate responsibility.

Our supply chain

Our supply chain procedures include a Global Supplier Qualification Process (GSQP) for potential and existing suppliers. GSQP allows the systematic identification, selection, auditing, verification, and development of global suppliers based on quality and sustainable supply chain practices and performance. Our procurement management carefully select and evaluate suppliers' processes and products, this may include, particularly where a higher risk is identified, on-site visits and audit by internal sourcing personnel. In case of non-compliance, either the supplier is not qualified, or a corrective action plan is implemented before the partnership is continued. Our procedures examine procurement spend in countries identified as having high risk, allowing us to efficiently focus our due diligence and examinations.

While our supply chains are global, the majority of our supplier relationships are long-term and stable, allowing Sulzer to consistently communicate and influence our expectations for performance and good practices.

Compliance and Training

Every legal entity within Sulzer has an appointed Compliance Officer who is responsible for ensuring that the Code of Conduct is adhered to and can also give advice and direction to local employees on ensuring that our policies and principles are appropriately implemented. In addition, we require our employees (including our procurement teams) to undertake regular compliance training on a variety of important compliance topics including how to spot and raise any issues (including Modern Slavery) both internally and within our supply chain. Whilst the incidence of classroom training has reduced in 2022, much of our compliance training is internet based and has been able to continue successfully. We have also used virtual training across various electronic mediums to supplement this.

During 2022, targeted Modern Slavery and Human Trafficking Compliance Webinars were delivered to 1924 Sulzer employees, and 21,797 e-learning modules were delivered worldwide to raise awareness on compliance issues. We believe this training is essential to further reduce the risk in our business and supply chain and we will look to repeat and expand such training in the future. We also provide compliance training to suppliers who attend our regional supplier conferences.

Continued improvement

We believe that our current systems and procedures are robust in identifying any evidence of modern slavery or human trafficking within our organization, and that this risk remains low. Nevertheless, we recognize the need to continue to monitor, improve and enhance our tools and procedures on this complex subject.

During the financial year ending 31 December 2022, there were no reports or findings of the presence of modern slavery or human trafficking in our business and supply chain.

Inquiries

If you have any questions about how Sulzer addresses and manages fundamental human rights and decent work conditions, please send your enquiry in writing to: Claudia.Kolly@sulzer.com

Suzanne Thoma



Executive President
For and on behalf of Sulzer AG