



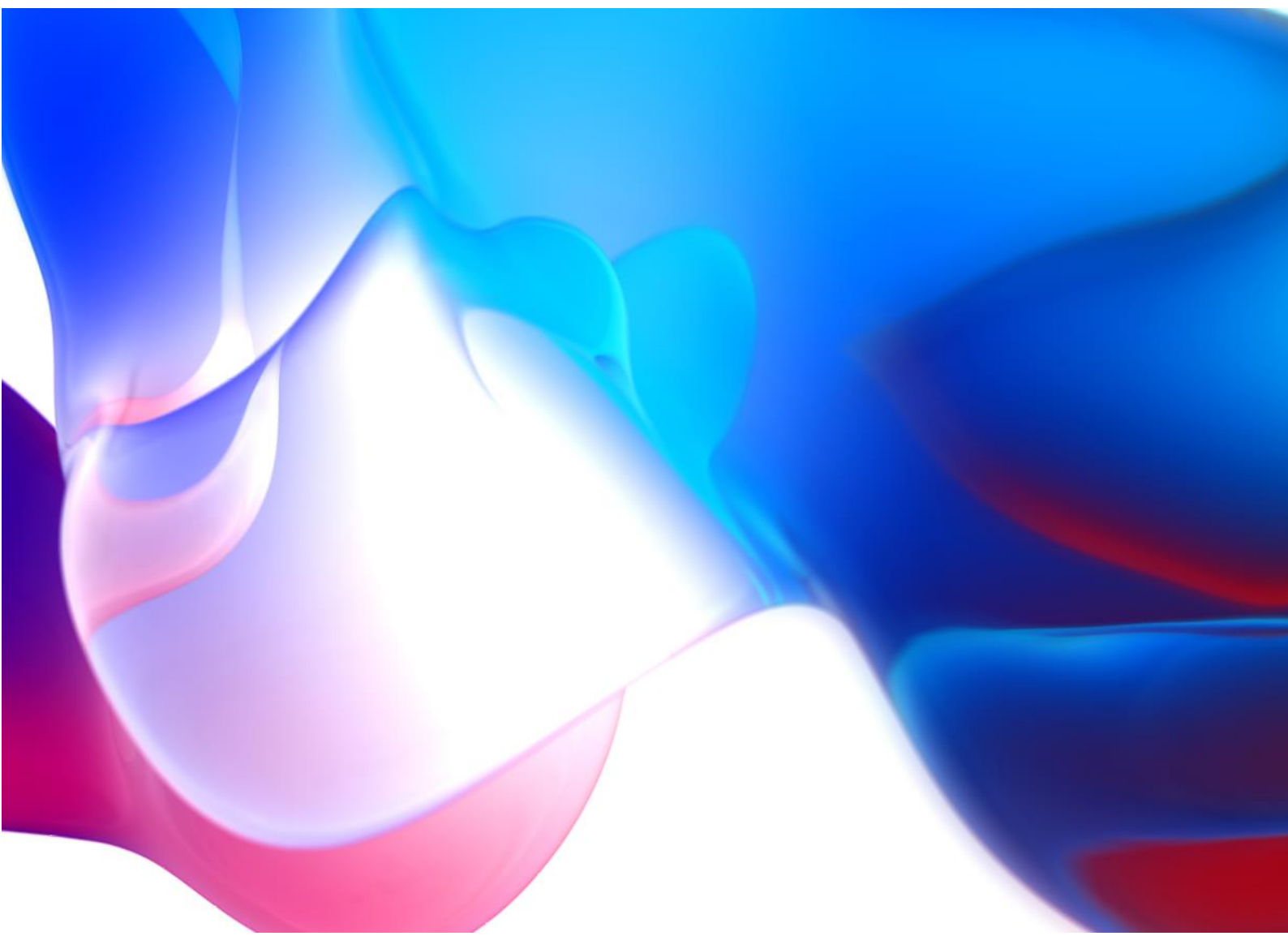
Sulzer Pumps Wastewater Norway AS

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# Norwegian Transparency Act Report 2024

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## 2 Introduction

### 2.1 Scope and Purpose

#### 2.1.1 The scope and purpose of the act

The Transparency Act came into force on 1 July 2022 in Norway. The purpose of the Act is to promote companies' respect for fundamental human rights and decent working conditions, and to ensure public access to information. The law requires the company to conduct due diligence to identify actual or potential negative impacts on fundamental human rights and decent working conditions in its own operations and in its supply chain. Sulzer Pumps Wastewater Norway AS (SPWN) endeavours to ensure that the company operates as per the requirements of the Transparency Act and the OECD Due Diligence Guidance for Responsible Business Conduct, and works on mapping the supply chain in line with the requirements of the law. If the results of the due diligence assessments reveal violations or suspected violations of the above-mentioned rights, the company will endeavour to clarify the actual circumstances and initiate the necessary measures. The company will prioritise and initiate measures in the areas with the most serious risk of violations of human rights and decent working conditions.

The company's work on the Transparency Act is anchored with the Board of Directors of SPWN, and Sulzer Group's guidelines and annual reports are published on the Group's website ([www.Sulzer.com](http://www.Sulzer.com)) under "Sustainability" by June 30<sup>th</sup> every year.

#### 2.1.2 The scope and purpose of this report

The supplier analysis conducted annually in SPWN has confirmed that the majority of purchases made by the company are from Sulzer subsidiaries. As a result, a significant portion of this report focuses on Sulzer's strong compliance with its own policies and directives.

The report concludes with supply chain due diligence actions taken in SPWN in 2024, and plans for 2025.

### 3 Company Analysis

#### 3.1 Description of Sulzer Pumps Wastewater Norway AS (SPWN)

SPWN has its head office located in Drengsrudhagen 4, in Asker, Norway, since October 2022.

The company employs 66 individuals, 52 for its Wastewater business, and 14 for its Electrocoalescence Technology (ECT - previously Chemtech) business as of December 31st, 2024. This number has increased from 62 full-time equivalents (“FTEs”) as of December 31, 2023.

The simplified legal chart below illustrates the legal structure of SPWN, as of December 31st, 2024.



#### 3.2 Management Structure of SPWN AS

SPWN operates in the Water & Industrial (WIBU) Division, in the Northern European Central Asia (NECA) Region, and also has a department in the Ventures Division, dealing with Electrocoalescence Technology (ECT). SPWN’s managing director reports to the Head of Sales Nordics, located in Sulzer Pumps Sweden AB, in Sweden. Anniken Alsos replaced Atle Oxaas as Managing Director of the legal entity from 01.01.2024.

#### 3.3 Business Model and Strategy

SPWN acts as a limited risk distributor of the wastewater product portfolio and has the responsibility for sales in its defined market. As a distributor (with a limited functional profile), SPWN’s responsibilities include the acquisition of new customers, tender preparation, negotiating with customers, as well as booking order intake and the handling of the invoice process and cash collection.

SPWN’s area of business is the sales and services of various kinds of pumps for markets related to water, wastewater, and industrial process pumps. The segments in those areas relate to municipal water and wastewater, de-watering, and water treatment, food & fish farming, pulp & paper. SPWN’s main sales area is Norway, but it also serves the market in Iceland.

SPWN also houses the ECT Venture, and functions as a sales office for the ECT product portfolio and as such also has the responsibility for sales and services in the ventures defined market. SPWN’s responsibilities include the handling of existing customers, acquisition of new customers, tender preparations, negotiation with customers, and dealing with order intakes. Order intake includes new and replacement equipment for separation technology in upstream oil & gas, chemical, petrochemical, and

refinery markets. In addition, process plants, static mixers, and polymers are important fields and markets for the ECT venture in SPWN.

SPWN's main strategy is to differentiate in projects by providing services not readily available by the company's competitors. Such services may include (but are not limited to) process studies, or customized solutions in all areas where SPWN is active. Given SPWN's good relationship with customers and the well-established position Sulzer has in the market, SPWN is recognized as a strong player and an attractive option among both competitors and customers.

## 4 Group policies and due diligence processes

SPWN is fully aligned with the comprehensive global corporate compliance program run by the global mother company. Sulzer, and its daughter company SPWN does this in order to guide its decision-making and to promote ethical, legally compliant and socially responsible business conduct. Amongst others, the policies set out below, show SPWN's commitment to the respect of human rights, and to addressing eventual violations of these rights.

### 4.1 Working conditions

Having good working conditions is important to SPWN as this enables attracting and retaining talents while boosting innovation and productivity. This is mainly built around an open-dialogue-culture and strong focus on a safe work environment.

Employee engagement and well-being are frequently measured, both locally and globally, with tools such as "Voice of Sulzer" (bi-annual global employee engagement survey), "Flow equipment change survey" (single specific topic survey), "Winningtemp" (weekly running employee engagement survey tool), as well as having a global compliance hotline where grievances can be anonymously reported.

SPWN strives to ensure that the company's employees enjoy a safe work environment in line with our QESH (Quality, Environment, Safety, Health) Policy.

While the company is aware of the high standard of living and work safety enjoyed in Norway, SPWN are also aware that working conditions in other countries, where our supply chain may operate, may be in risk of more fundamental safety dangers. We hold our suppliers responsible where it is in our power to do so.

### 4.2 Code of Business Conduct

SPWN strictly maintains the rules and guidelines in the Group's [Code of Business Conduct](#) (COBC), [available in multiple languages under [Governance | Sulzer](#)]. All new employees are required to read and sign the COBC, and employees are frequently reminded of the tenets through mandatory e-learning and compliance trainings, in order to maintain a high ethical standard in how we conduct business in Norway. (Kindly refer to the [Non-financial report 2024](#) (NFR24), Page 38-39, for details.)

Employees in SPWN are regularly enrolled in mandatory e-learning training in topics related to the COBC, such as anti-discrimination, anti-harassment, anti-corruption courses.

Sulzer has designed a Supplier Code of Business Conduct (SCOBC) to enable cascading its own requirements and commitments up the supply chain. The SCOBC is available on our website under: [Sulzer Supplier Code of Business Conduct](#). This requests suppliers to respect the 10 principles of the [United Nations Global Compact](#) on top of various sustainability and human rights related topics.

## 4.3 Whistleblowing

Sulzer continues to maintain an environment where employees can and should report critical findings in case of breaches of Sulzer's COBC in their organization. Reporting is encouraged and whistleblowers are protected by the groups legal team to make sure that they do not face negative repercussions as a result of sharing their concerns.

Whistleblowing is actively encouraged locally in SPWN as well, with zero tolerance for negative repercussions as a result of whistleblowing.

Sulzer's global reporting scheme is described in more details in the annual NFR report. In 2024, 167 reports were generated globally, and 28 cases were fully or partially substantiated, none of which applied to SPWN. The whistleblower's protection scheme is described on page 50 in NFR24.

## 4.4 Human Rights

Sulzer is committed to the United Nations Guiding Principles on business and human rights. It supports the UN Universal Declaration of Human Rights, the UN Global Compact, the OECD guidelines for Multinational Enterprises and the International Labor Organization declaration on fundamental principles and rights at work. As per Sulzer's sustainability directive, its human rights directive and its QESH directive, we respect human rights and design processes to identify, prevent and mitigate any adverse impacts throughout our value chain.

Our policies are structured as per below:

- The Sulzer Sustainability Directive is the overarching document that frames Sulzer's sustainability framework ([Sustainability directive 2022](#))
- The QESH Directive describes how Quality, Environment, Safety and Health are embedded in Sulzer's corporate strategy ([policy updated in 2025](#)).
- The Sulzer Human Right Directive describes the approach to ensure human rights globally ([Human rights directive 2022](#))
- The Sulzer Child Rights directive details the approach to ensure child rights globally ([Sulzer child rights policy](#))
- The Sulzer Human Rights Salient Issue Process is a technical document that describes the various steps to assess the risks and manage salient issues. These are aligned with the UN Global Compact's and the OECD guideline.

Sulzer integrates the salient issues in its sustainability due diligence process. Data is gathered by the procurement teams and analysis are performed on a regular basis.

As part of its UN Global Compact (UNGC) participation, Sulzer is requested to disclose annually a "Communication on Progress". The report describes the improvements made in the fields of human rights, labour, environment and anti-corruption. All reports, including the report for 2024, are disclosed and available on Sulzer's company website: [Sustainability | Sulzer](#)

## 4.5 Child Rights

On a Group level Sulzer has identified the most salient human rights issues as:

- Child labor
- Forced labor
- Health & Safety at work.

Based on the internal and external feedback gained during the deployment of the Human Rights Directive, Sulzer identified a need to clarify what child rights are. This led to the drafting of Sulzer's Child Right Directive that covers not only child labour, but overall child's protection in the business environment: from respecting child rights at work to beyond work (e.g. flexwork for care givers, site access control to prevent children entering unsafe premises, as well as education of girls through our WISE program).

Child labour is part of the screening criteria set in our sustainability supplier due diligence process (See due diligence section for more details).

## 4.6 Sustainability

Sulzer aims to harness the power of engineering to serve essential industries to contribute to a prosperous economy and sustainable societies. Sulzer focuses on three markets: Energy security and transition, natural resources processing and recycling, performing and sustainable process industries.

All three markets are in fundamental transition process, driven by long-term implications of climate change, the need to ensure security of supply of energy as well as natural resources. Sulzer delivers solutions to meet its client's sustainability needs and support these transition processes, with the focus on energy efficiency, cleaner processes, decarbonization and to enable a circular economy.

Sulzer ensures compliance with applicable laws, regulations and is committed to high ethical and social standards. Sulzer acts with a high level of integrity, respecting international human and labor rights.

Sulzer ensures operational excellence for the management of a complex regulatory landscape.

The ESG strategy forms an integral part of Sulzer's business DNA, the corporate strategy "Sulzer 2028" and supports its organic growth.

Sulzer involves all employees and empowers them to contribute to the ESG strategy. It provides the conditions to be safe and well along their career, fostering a professional development.

Sulzer partners closely with its ecosystem, from customers, suppliers to contractors and other stakeholders to jointly address and contribute to a sustainable development. Regular engagements with stakeholders enable Sulzer to continuously review its performance and the efficiency of its approach, learn and adapt.

Sulzer publishes annually a non-financial report to inform all stakeholders about the status, progress and processes related to environmental, social and governmental issues. The basis for the non-financial report are legal requirements and a double materiality assessment.

Sulzer's key commitments to Sustainability are,

- ESG is integral part of Sulzer's mission and its corporate strategy "Sulzer 2028"
- Sulzer supports client's sustainability needs and their transition processes
- Sulzer reduces its ecological footprint with a focus on GHG emissions and circularity

- Sulzer complies with applicable laws, regulations and reporting requirements
- Sulzer focuses its efforts on impacts, risks and opportunities as identified in its double materiality assessment
- Sulzer respects international human and labor rights

The Sustainability Directive forms the basis of Sulzer's sustainability management. It is applicable to all Sulzer legal entities, employees, and organizations under Sulzer's management control worldwide.

Sulzer regularly engages with its stakeholders (employees, business partners, business influencers, financial institutions, unions, local government, and communities).

## 4.7 Quality, Environment, Safety and Health (QESH)

SPWN strictly follows all Group QESH related policies.

Sulzer has a long history of driving QESH. Renewed in 2025, our [QESH policy](#) shows Sulzer's commitment to Quality, Environment, Safety and Health (QESH). It describes how QESH contributes to and continuously improves Sulzer sustainability strategy.

The company's commitments are:

- Comply with the applicable laws, regulations and Sulzer QESH guidelines and handbooks,
- take appropriate actions and measures of identified material impacts, risks and opportunities,
- satisfy client's requirements,
- consult relevant stakeholders and promote workers' participation,
- protect the environment and communities in which Sulzer operates from the impacts of its own operations, products, and services,
- protect workers by providing a safe and healthy work environment aiming at preventing any injury and illness,
- perform risk assessments using the hierarchy of controls to prevent and minimize impacts,
- risks, defects and respond to incidents,
- prevent inefficiency and waste in processes by promoting lean principles,
- not accept defects by following the right quality behavior «do not accept, do not create and do not forward a defect»,
- be transparent and disclose relevant information to stakeholders

The company lives its "safety first" principle. In 2024, the accident frequency rate (AFR) in Sulzer was 1.02 per million worked hours, slightly above the target of 1. (Non-financial report 2024, *Page: 42*)

In 2024 there were no lost time accidents in SPWN. SPWN is ISO-certified in 9001:2015.

## 5 Supply Chain Due Diligence

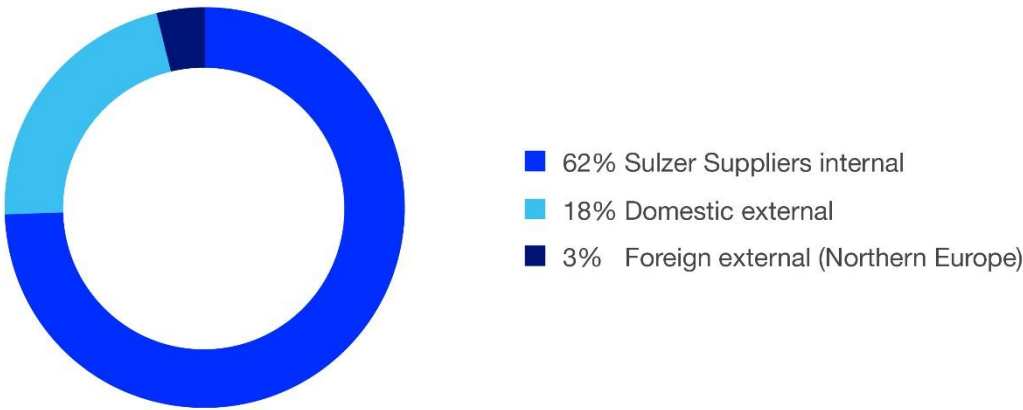
### 5.1 Analysis 2024

The supplier analysis done for 2024 in SPWN has shown that Sulzer subsidiaries account for 62% of all procurement and non-procurement costs.



## Percentage split Top 20

82% of total purchases 2024



8 of the top 20 suppliers to SPWN are Sulzer subsidiaries. The remaining 12 on the top 20 list, account for 21% of purchases in 2024. Of these 12 external suppliers, 1 is based in Germany, 1 in the Netherlands, and the 10 remaining suppliers are located in Norway. In total, 20 suppliers (8 of which are Sulzer) account for 82% of the company’s purchases in 2024. None of the external suppliers to SPWN on the top 20 list are located in developing countries. The risk of human rights violations and decent work condition violations is considered to be minimal.

### 5.2 Supplier Risk analysis for SPWN

- Supplier categories: Pumps manufacturers, Insurance company, car leasing company, wholesaler of spare parts for pumps and pumping stations, logistics, production of components, as well as office space rental.
  - Sulzer suppliers: Insignificant risk of breaches towards human rights and decent work conditions due to strong in-company compliance to global standards.
  - Norwegian external suppliers: We analyze their own transparency act reports published, where available. 5 of the Norwegian external suppliers do not have a publicly available transparency act report for 2024, these will be contacted in 2025 as part of the continued work in this area. In 2024 there were no negative findings uncovered in the supply chains of the Norwegian external suppliers with available reports.
  - Foreign external suppliers: Two foreign external suppliers, both from northern Europe (who account for under 3% of total procurement cost). Deemed as low risk.

### 5.3 Future focus

In 2024 SPWN utilized 441 suppliers, 151 of these were one-time purchases. As depicted in the graph above, Sulzer subsidiaries account for the majority of purchases (62%).

To further improve transparency and continuously ensure compliance, SPWN are focusing on the following topics in 2025 and the following years:

- 1) Decreasing number of suppliers in order to enable stronger relationships and closer collaboration.
  - a. Expected result: Higher degree of impact on our suppliers and better overview.
- 2) Standardisation of interface with suppliers in order to ease communication.
  - a. Expected result: Enable better data collection.
- 3) Identify and analyse potential suppliers concerning human rights risk violations or decent work conditions violations. Evaluate measures in case of non-compliance.
  - a. Expected result: Better overview of potential risk of violations in our supply chain.
- 4) Involvement of all employees in sustainability related initiatives, by incorporation of relevant topics as mandatory objectives in the annual objective-setting process.
  - a. Expected result: Involve all employees actively in supporting a resilient supply chain, respecting human rights and ensuring decent work conditions.

# 6 Signatures

Sign, place and date:

This document is electronically signed.

Asker, 30.06.2025

DocuSigned by:

Alessandro Bertuzzo

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Alessandro Bertuzzo

Chairman of the Board

Signed by:

Anders Engström

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Anders Engström

Board Member

DocuSigned by:

Anniken Alsos

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Anniken Alsos

Managing Director

## 7 Appendix

Sulzer Pumps Wastewater Norway AS is compliant with all Sulzer directives and policies, e.g.:

[Sustainability | Sulzer](#) (statements, directives, and policies)

- Non-Financial Report 2024: [nfr24.pdf](#)
- [Sulzer UN Global Compact COP 2024](#)
- [Sustainability Report 2025](#)
- [Human Rights Directive](#)
- [Modern Slavery and Human Trafficking Statement](#)
- [Sulzer Sustainability Directive](#)
- [Quality, Environment, Safety and Health \(QESH\) Policy](#)
- [Sulzer Child Rights Policy](#)
- [Sulzer Supply Chain Policy](#)