



Transparency Act Statement (Åpenhetsloven)

For the year ended 31 December 2025

1. Introduction and scope

This statement is published pursuant to the Norwegian Transparency Act (Åpenhetsloven) and describes how **Airswift Global AS** (the “Company”) works to identify, prevent and address actual and potential adverse impacts on **fundamental human rights and decent working conditions** in its own operations and throughout its supply chain and business partner relationships.

The statement covers the Company’s own operations and relevant parts of the value chain, including upstream suppliers and downstream business relationships, and is aligned with the Company’s Sustainability Statement prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS).

This statement applies to the reporting period from **1 January 2025 to 31 December 2025**.

2. Organisation, operations and value chain

Airswift Global AS operates as a global workforce solutions provider, delivering contract hire, permanent hire, Employer of Record (EoR) and Managed Service Provider (MSP) services within the STEM industries, including energy, infrastructure and technology.

The Company’s value chain consists primarily of:

- **Upstream suppliers**, such as technology providers, professional services, compliance and training partners, and office-related service providers
- **Own operations**, including recruitment, workforce management, and employment-related services
- **Downstream relationships**, primarily corporate clients to whom workforce services are provided

The Company does not operate manufacturing facilities or labour-intensive production sites and does not engage in high-risk extraction or commodity industries. The majority of suppliers provide services rather than goods.

3. Policies and governance framework

The Company has established policies and governing frameworks that anchor its commitment to human rights and decent working conditions at senior management and Board level. Key policies include:

- Code of Business Ethics
- Human Rights Policy
- Whistleblower Policy
- Anti-Bribery and Corruption Procedure
- Equal Opportunity Handbook
- Health, Safety and Environment (HSE) Manual



These policies are approved by the Board and apply globally to employees, contractors, and relevant business partners. They are supported by training, onboarding processes and internal reporting mechanisms.

Overall responsibility for sustainability-related impacts, risks and opportunities, including matters related to the Transparency Act, rests with the Company's governing bodies and senior management, with day-to-day coordination led by appointed senior executives.

4. Due diligence process

The Company conducts ongoing due diligence in line with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, integrated into its broader risk management and sustainability processes.

The due diligence process includes the following key steps:

4.1 Identification and risk assessment

- Mapping of the Company's activities, operations and value chain to identify areas with potential risk to human rights and working conditions
- Assessment of suppliers and business partners by activity type, geographic exposure and sector risk
- Consideration of risks related to labour rights, health and safety, discrimination, ethical conduct and data protection

4.2 Supplier onboarding and screening

- New suppliers are subject to due diligence during onboarding, including sanctions screening, anti-bribery and corruption assessments, and modern slavery considerations
- Medium- and high-risk suppliers require enhanced review and approval prior to onboarding

4.3 Monitoring and follow-up

- Ongoing monitoring of sustainability-related risks through internal controls and periodic reviews
- Use of internal and external guidance, benchmarking and gap analyses to strengthen processes
- Regular reporting to senior management and governing bodies

4.4 Grievance and remediation mechanisms

- Confidential reporting channels are available to employees and external stakeholders through the Whistleblower Policy
- Reported concerns are investigated by impartial parties, with corrective actions taken where necessary
- Measures may include engagement with suppliers, corrective action plans or, where appropriate, termination of business relationships

5. Identified risks and impacts



Based on the Company's due diligence activities during the reporting period, no actual adverse impacts on fundamental human rights or decent working conditions have been identified within the Company's own operations.

Potential risks identified relate primarily to:

- Health and safety in office and contractor environments
- Labour rights and working conditions for contractors placed at client sites where the Company delivers workforce services
- Ethical conduct and data protection in recruitment and workforce management activities

Where contractors are deployed to client-controlled worksites, the Company does not exercise direct control over day-to-day working conditions or site management. However, the Company seeks to mitigate associated human rights and working conditions risks through its due diligence processes, contractual frameworks, and ongoing engagement with both clients and contractors. This includes assessing client risk profiles, setting clear contractual expectations, and maintaining regular communication to identify and address potential concerns.

Based on the due diligence activities performed during the reporting period, including supplier screening, risk assessments and monitoring processes, the Company has not identified actual adverse impacts or material risks related to forced labour, child labour, or other severe human rights violations within its own operations or among its suppliers and business partners.

6. Measures implemented

To prevent and mitigate potential adverse impacts, the Company has implemented the following measures:

- Mandatory policies governing ethical conduct, human rights and non-discrimination
- Health and safety management systems, training and emergency preparedness
- Supplier screening and due diligence procedures, including anti-bribery and modern slavery assessments
- Accessible grievance mechanisms and whistleblowing channels
- Regular internal reviews and sustainability governance updates

These measures are designed to prevent harm, strengthen compliance and ensure responsible business conduct across the value chain.

7. Results and future focus

During the reporting period, the Company focused on strengthening governance structures, improving data quality and embedding sustainability and due diligence processes further into business operations.

No material violations or incidents requiring remediation were identified. The Company will continue to:

- Develop internal capabilities related to sustainability and human rights due diligence
- Improve monitoring and documentation of supplier-related risks
- Adapt processes in line with regulatory developments and best practice



8. Right to information

In accordance with the Transparency Act, any person has the right to request information regarding how the Company addresses actual and potential adverse impacts on human rights and working conditions.

Requests may be submitted through the Company's established contact channels and will be handled in accordance with statutory response timelines.

9. Approval and publication

This Transparency Act statement has been approved by senior management and is published on the Company's website in accordance with the requirements of the Norwegian Transparency Act.

Board approval

This Transparency Act (Åpenhetsloven) statement was **approved by the Board of Directors of Airswift Global AS on 27 April 2026** and covers the reporting period from 1 January 2025 to 31 December 2025.

The statement is published on the Company's website and will be reviewed and updated annually in accordance with the requirements of the Norwegian Transparency Act.

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