

# Statement in accordance with the Transparency Act of 01.07.2022 for: CSUB AS Org.nr. 885 590 292

Statement period: 01.01.24 – 31.12.24

**CSUB AS and our operational areas are organized as follows:**

Description of the business:

CSUB AS provides Design, engineering, manufacturing, and supply of composite structures.

Organization:



**Main office:** Skytebanen 14, 4841 Arendal Norway

**Production Norway:** Nitridveien 10, 4810 Eydehavn

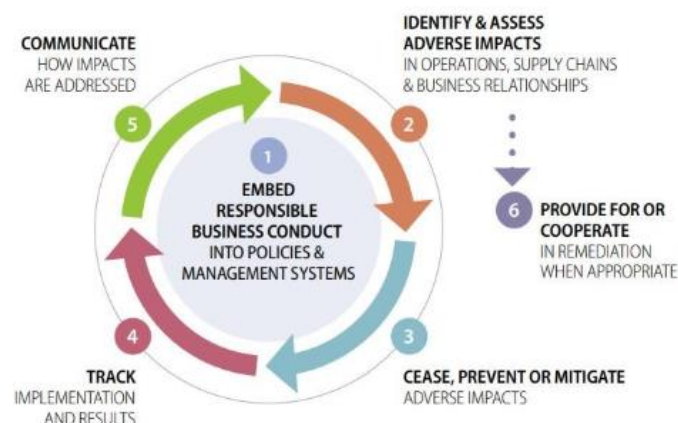
**Production Lithuania:** Pilies g. 8, 91503, Klaipeda

The main products of the CSUB Group are customized composite structures manufactured by vacuum injections. The traditional market for these structures has been the international subsea oil and gas industry. Over the last years the manufacturing of fish tanks for fish farming has also become a substantial part of the business.

Our major materials suppliers supply fibre, resin, and ballast. We are not large enough with any of them to have significant impact on their mode of operation.

CSUB AS has established the following guidelines to deal with actual and potential negative consequences for fundamental human rights and decent working conditions related to the requirements of the Transparency Act.

OECD Guidelines for Multinational Enterprises on Responsible Business Conduct are the basis for the structure of our due diligence



## 1) Embed responsible business conduct into policies

### Relevant documents in our management system:

• Corporate Policy CSUB	TQM doc. No. 4
• Code of Conduct	TQM doc. No. 299
• Whistleblowing	TQM doc. No. 184
• Sustainability Strategy	TQM doc. No. 298
• The Transparency Act Procedure	TQM doc. No. 318
• General terms for purchases	TQM doc. No. 72
• Yearly evaluation of critical suppliers	TQM doc. No. 100
• Supplier HSEQ & Self-Assessment Form	TQM doc. No. 343

### Membership:

CSUB is a member of UN Global Compact.

Communication On Progress (COP) is issued yearly.

### Certificates:

ISO 45001:2018

ISO 14001:2015

ISO 9001:2015

### Employee survey:

An employee survey has been conducted in May 2025. Findings will be followed up by HR.

Any negative findings will be described in next year's statement.

This employee survey will be conducted yearly.

## 2) Identify and assess actual and potential adverse impacts

### 2.1 Internal

- (Potential risk) Living wage in Lithuania. Lithuania's statutory minimum wage rose to €1 038 gross per month on 1 January 2025.  
The status of this at our plant in Klaipeda is uncertain.
- Workers exposure to styrene and other solvents in Eydehavn (Norway) is close to recommended thresholds. (Documented by 3<sup>rd</sup> party working environment measurements).

### 2.2 Supply chain

To assess potential risks related to human rights violations within CSUB's supply chain, the company has previously implemented a supplier categorization framework based on the following criteria:

- Strategic importance to CSUB operations
- Supplier category (e.g., raw materials, services, consumables)
- Country of operation

To identify actual and potential human rights and decent working conditions risks, CSUB has utilized the following tools:

- ITUC Global Rights Index (International Trade Union Confederation)

- Third-party certifications (e.g., ISO 9001, ISO 14000, ISO 45001)
- CSUB suppliers Transparency Act Reports (If available)

### **3) Implement measures**

The following measures have been taken by us to stop known or suspected negative consequences:

#### **3.1 Internal**

An internal survey of payment conditions (LT).

25.06.25. HR Klaipeda confirms that the starting salary is above LT minimum wage.

#### **Styrene/Solvents**

Workers' exposure to styrene and other solvents.

Several measures have been taken to reduce styrene/solvent exposure.

- Ventilation when mixing hardener/resin
- Substitution of substances with solvents
- Improved information to operators regarding protective equipment
- Improvement of existing procedures
- Some input materials are replaced with low-styrene products
- Covering open containers to reduce solvent vapor
- Standardization of protective masks/filters

#### **3.2 Supply Chain**

To further investigate the potential risk of human rights violations in higher risk countries during 2025, CSUB will review the following supplier documentation:

- Labor rights, health & safety, and forced/child labor policies
- Supplier Code of Conduct
- Third-party audit reports
- Wage and working hours policies
- If necessary, CSUB will conduct an audit

CSUB will apply a Human Rights Risk Matrix to assess, classify, and prioritize risks based on likelihood and severity of impact. The Human Rights Risk Matrix will be included in next year statement.

### **4) Track implementation and results**

#### **4.1 Internal**

##### **Payment LT**

The internal survey of payment conditions revealed no deviations.

Workers' exposure to styrene and other solvents.

New measurements of the working atmosphere, by 3<sup>rd</sup> party, are planned in autumn 2025.

#### **4.2 Supply Chain**

Following the assessment, CSUB will evaluate:

- Gaps between current supplier practices and required standards
- Severity and urgency of any identified non-compliance

Where necessary, CSUB will collaborate with suppliers to develop and implement Corrective Action Plans (CAPs) with clearly defined timelines and performance milestones.

If serious violations of human rights or decent working conditions are identified and the supplier demonstrates unwillingness to address the issues, the following actions may be considered as part of supply chain decision-making:

- Suspending or terminating relationships with non-compliant suppliers

#### **5) Communicate with affected stakeholders and right-holders.**

##### **Communication**

The statement regarding the Transparency Act is available on [www.csub.com](http://www.csub.com).

Any questions related to our work with transparency can be sent to [aaa@csub.com](mailto:aaa@csub.com).

A response from CSUB will be given within 3 weeks.

#### **6) Remediate and compensate**

Nothing to report

##### **HSE**

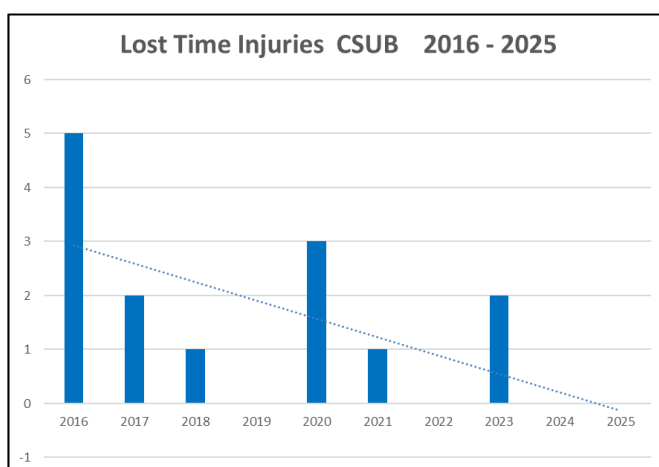
In our production several high-risk operations are identified.

- Work at height
- Heavy lift
- Forklift activities
- Use of machines
- Use of sharp tools

Improvement of our HSE system is a continuous process and involves all personnel.

This work will never end. Due to improved routines, our HSE performance shows a positive trend.

Below is a graph showing the number of injuries with following sick leave (LTI):



The working environment in our production halls has challenges with respect to solvents, dust and noise.

Along with employee representatives we work systematically to improve these conditions (AMU).

A 3<sup>rd</sup> party (CHS) conduct working atmosphere measurements each year.

Information regarding possible health risks and the necessity of correct PPE has a high priority.

## Supply-chain overview

CSUB's supply chain is a multi-tier network that delivers everything from glass fibre to consultancy hours. For reporting purposes, we group purchases into six spend categories:

- Raw materials & production aids (e.g. glass fibre, vinyl-ester resin, ballast billets)
- Consumables & general services (MRO items, PPE, maintenance contractors)
- Project-specific goods and services (tailor-made steel inserts, logistics)
- Capital investments (moulds, CNC machines, lifting beams)
- Office supplies (IT hardware, stationery, utilities)
- Professional & consultancy services (design, certification, legal)

Of these six categories, raw materials account for a major share of CSUB's annual spend and carry the highest inherent human-rights risk because they originate in high-impact chemical and fibre-production sectors.

Material	Main production country	2025 ITUC rating*	CSUB risk band
Glass fibre	China	<b>5 – No guarantee of rights</b>	<b>High</b>
Glass fibre	Thailand	<b>5 – No guarantee of rights</b>	<b>High</b>
Glass fibre	Lithuania	<b>2 – Repeated violations</b>	Low
Resin	Norway	<b>1 – Sporadic violations</b> (Norway is one of seven countries with the top score)	Low
Resin	Switzerland / Italy	<b>Switzerland 2, Italy 2–3</b> (rating fell in 2025 but remains in the lower-risk band for Europe)	Low
Ballast billets	Norway	<b>1 (see above)</b>	Low
Ballast billets	Poland	<b>3 – Regular violations</b>	<b>Medium</b>

\*ITUC Global Rights Index scale: 1 = sporadic violations → 5+ = no guarantee of rights; CSUB maps ratings 1–2 = Low, 3 = Medium, 4–5 = High.

## Due-diligence measures for high-risk glass-fibre suppliers

- Location check: confirmed all Thai and Chinese plants lie outside provinces with known high-risk human-rights profiles.
- Policy review: verified that each supplier's has an internal code/documentation that protects human rights and decent working conditions.
- Up-stream mapping – none of the tier-2 producers appear on the U.S. Customs Forced-Labour Entity List (checked May 2025).

Outcome: No red flags were identified; suppliers remain on the approved list.

CSUB AS:

Place: Arendal

Date: 26.06.25

All board members and CEO:

Mindaugas Rapolas	Chair
Helge Rasmussen	Board
Mindaugas Utkevicius	Board
Sam Syvertsen	Board
Ann Kari Amundsen Heier	Board
Anders Holm	CEO