

Caiano AS

CAÍANO

Account of due dilligence Norwegian Transparency Act for Caiano AS

Introduction

Caiano AS (hereafter referred to as «Caiano») has always focused on long-term commitment, hard work, sincerity and trust.

The vision of Caiano is to create lasting values in a respectable, responsible and good manner. Creating values is more than creating financial proceeds. It is about creating and developing businesses and contribute to changes that develop our community and individuals.

Caiano is a family-owned business with active ownership. Caiano operates and manages most of the investments internally. Our role as an active owner gives us the opportunity to focus on sustainability and to make sustainable changes. Good corporate governance is important for us. Short-term profit can contradict sustainability and long-term value creation. We have both the will and ability to think long-term. Caiano's influence contributes positively to long-term value creation.

Through our business as active owner and investor, Caiano has since the start in 1965 worked for a sustainable development. In our opinion sustainability and profitability are interconnected. We can not be profitable without also taking care of the people and the environment. We have worked to create long lasting values, create positive footprints and develop businesses that contribute to changes that develop our society and individuals. This is the core of creating a sustainable development for us.

The Norwegian Transparency Act entered into force 1 July 2022. The Transparency Act shall promote enterprises` respect for fundamental human rights and decent working conditions. This account focuses on the importance of the purpose that the Transparency Act is meant to promote both in the parent company, but also in its subsidiaries.

Caiano AS is the parent company of the group, where the main business areas are shipping, real estate, hotels, fisheries, terminals and finance.

The Caiano Group consists of different companies with different level of influence on the relevant goals. Caiano complies with its duties in relation to the Transparency Act through reporting in its different subgroups/-companies and board representation. Through board representation Caiano actively participates in the company's work related to environment-, social- and governance (ESG), including that the work related to the Transparency Act still gets the necessary focus. Through its work and mapping, the companies have performed due dilligence related to their business. More information on due diligence account in relation to the Transparency Act can be found on the websites of our subgroups/subsidiaries Caiano Eiendom, Euro-Terminal, Qubus Hotels, Wilson og Caiano Hotels (Hotel Maritim og Hotel Saga).

Work related to due dilligence and the Transparency Act

At the Caiano Group there has been a focus on promoting the purpose of the Transparency Act and awareness related to this throughout the Group. This is connected to the values of Caiano related to creating values in a proper, responsible and good manner – a vision that also involves focusing on promoting respect for human rights and decent working conditions.

Work related to due dilligence is embedded in the company's vision and board. Caiano and its daughters also have a vision of zero accidents and focus on preventing incidents with potential negative effect on working conditions and human rights. See also below under the point related to Corporate governance below.

Caiano performs due dilligence / reporting through its subgroups/subsidiaries. The due dilligence is made with the Transparency Act § 4 and OECS's guidelines as a starting point, including embedding this at board level and guidelines, identification/mapping and assessment of potential and possible adverse impact for working conditions and human rights in our own company, and in relation to suppliers/business partners, and look at measures in this relation. This does not mean that the work is done once and for all. This is a continuous process. The focus is on continuous improvement. Caiano's long-term focus also applies in relation to our choices of suppliers/business partners. In our opinion, this will make it easier to know if the supplier is operating in a responsible manner and to be able to influence change.

1. **Anchored** in the company's vision, ethical guidelines for the company and ethical guidelines for the suppliers





2. **Mapping and assessing actual and potential risk** when it comes to the company and its suppliers/business partners.

3. Cease, prevent or mitigate adverse impact. Prevent by mapping and based on preventive measures through good dialogue, communication and co-operation with our suppliers/business partners.

4. Monitor the implementation and results

 $Based\ on\ preventive\ measures\ based\ on\ good\ dialogue\ and\ co-operation\ with\ our\ suppliers/business\ partners.$

Track implementation and results, use the experience to seek to improve in the future

6. **Provide for or co-operate in remediation where this is required in situations** where the company is responsible or use influence for follow up of the responsible party.

At Caiano there has and will continue to be a focus on this topic, for example through giving information and building the culture. Through the information given, the employees are reminded of the importance of the work on promoting the purpose of the Transparency Act, become familiar with the company ethical guidelines, where for example expectations, commitments and requirements for behaviour when it comes to diversity and anti-corruption are described, ethical guidelines for suppliers, routines for inquiries regarding the transparency act, IT security, procedures related to privacy protection, whistleblowing procedure and other guidelines. Information on this in order to increase focus on this internally is also given.

The fact that ee have ethical guidelines for Caiano's suppliers makes our expectations in relation to respect for human rights and decent working conditions visible for our suppliers and will be an important tool for the future in order to be able to have the possibility to influence. We have also developed a Q&A form, that has been used in relation to some suppliers to companies within the group.

Also, stakeholders have been identified in relation to the work performed in the group related to Transparency Act, like customers, suppliers, business partners, co-workers, representatives of the employees/unions, local community, public authorities, banks, competitors and owners. We communicate through our reporting and in relevant forums.

Further information on the company structure and area of business can be found on the company's webpage caiano.no.

Further information on work related to the Transparency act in our subgroups/subsidiaries can be found in accounts on the websites of these companies. Links to these websites are available on caiano.no.

Interested party can request information on how the enterprise that are within the scope of the Norwegian Transparency Act addresses actual and potential adverse impacts on fundamental human rights and decent working conditions in accordance with the act.

A request for information can be sent to: post@caiano.no.

Haugesund, juni 2025	
 Bernt Eidesvik, Chair of the Board	Eivind Eidesvik, Board Member
Please note that this document is only a translooriginal account for Caiano AS	ation into English, the Norwegian document is the

