

Seagull AS, Ocean Technologies Group Norway AS and Ocean TG Norway AS

Transparency Act Report

1 INTRODUCTION

This report has been prepared in accordance with section 5 of the Transparency Act and applies to Seagull AS ("**Seagull**"), Ocean Technologies Group Norway AS ("**Ocean Technologies Group**") and Ocean TG Norway AS ("**Ocean TG**"), collectively referred to as "**OTG**". The report summarises the approach taken by OTG to identify and assess actual and potential adverse impacts on human rights and decent working conditions in our own operations, supply chain and business partner relationships, as well as the results of completed due diligence assessments, including completed and planned measures related to human rights and decent working conditions.

Seagull, Ocean Technologies Group and OTG are covered by the Transparency Act on an independent basis. This report therefore covers the reporting obligations of these three companies.

This report covers the period 1 January 2024 – 31 December 2024. We will also refer to certain developments in 2025 where relevant.

The report will be published on the website oceantg.com. Requests for information related to the report or how Seagull, Ocean Technologies Group and/or Ocean TG manage actual and potential adverse impacts on human rights and decent working conditions can be sent to HRTeam@oceantg.com.

2 OUR ORGANISATION AND BUSINESS OPERATIONS

Ocean Technologies Group is a leading provider of competency management solutions and e-learning materials for maritime organisations around the world, offering an extensive library of digital training and onboard courses for regulatory compliance and improved seafarer knowledge. Ocean Technologies Group works with many of the world's leading shipping companies to deliver a full range of recruitment, career development, assessment and training tools to ensure compliance with STCW and IMO standards. Ocean Technologies Group software is used by more than 1 million seafarers across 20,000 vessels for 1,400 of the world's leading maritime companies.

Ocean Technologies Group has 11 employees in Tønsberg, who primarily perform administrative tasks and tasks related to storage etc. The company also has two subsidiaries, of which one is currently active: Seagull Maritime Information Technology GmbH (Germany), which has two employees who work with marketing. The company also has branches in Greece and Poland, which work with developing and customising e-learning systems for end users. The Greek branch has six employees, while the Polish branch has 24 employees. All of these are office workers.

Ocean TG has been developing fleet management software for the shipping industry for more than 30 years and leases software (fleet management systems, maintenance systems, procurement software) to customers for an annual fee. The company's products are highly specialised, with a high degree of customisation for each customer. Its flagship software, the TM Master suite, is one of the leading brands in the industry. More than 2,000 TM Master systems are licensed worldwide and used by a wide range of customers and vessels, from sophisticated tankers to workboats, navy vessels and offshore fleets. This includes some of the world's leading shipping companies such as OSM Maritime Group, Solstad Offshore, Tidewater, Fugro, Siem Offshore, Hurtigruten, Subsea 7 and Knutsen NYK Tankers.

Ocean TG is present on all continents, with offices and representatives in Norway, the UK and Singapore (which also covers New Zealand, Japan and the Philippines), as well as an agent in the USA. The head office is located in Bergen, Norway, and has seven employees, all of whom work in offices. Ocean TG has two wholly owned subsidiaries, of which one is active: Ocean Tech Asia Pte Ltd (Singapore), which covers the Asian markets and has four employees who are office workers.

Seagull owns the rights to the software used in the products Ocean Technologies Group and Ocean TG provide to their customers. Other than providing the software to Ocean Technologies Group and Ocean TG for a fee, Seagull does not itself provide any goods or services. The company has no employees, and is managed from London by employees of another company that is part of the global group of which Seagull is a part. Seagull has three subsidiaries: Ocean Technologies Group (wholly owned), Ocean TG (95.7 per cent owned by Seagull) and Seagull Maritime Information Technology Pte Ltd (Singapore). Seagull Maritime Information Technology Pte Ltd has nine employees and also has a branch in South Korea, which has two employees. All employees of the subsidiaries are office workers.

3 GUIDELINES AND ROUTINES FOR DUE DILIGENCE

OTG's overall focus on, and commitment to, ethical business practices is anchored in our Business Ethics & Conduct Policy. The Business Ethics & Conduct Policy includes, in addition to general provisions on compliance with laws, regulations and ethical obligations, as well as diversity and inclusion, provisions on anti-corruption, anti-money laundering and privacy.

Furthermore, OTG has a Modern Slavery Policy, which sets out a zero tolerance approach to all forms of modern slavery and prohibits any form of modern slavery in its own operations and in its supply chains. The policy also states that all suppliers must sign a responsible sourcing policy stating that they will comply with standards related to human rights, labour rights, health, environment and safety, and business ethics.

OTG also has a Prohibition of Harassment/Workplace Bullying Policy and a Data Privacy Policy. In addition, OTG has a whistleblowing policy, which states that all OTG employees can use the whistleblowing mechanism without fear of retaliation.

These policies are applicable to Seagull, Ocean Technologies Group and Ocean TG.

Regarding the due diligence performed, OTG has gathered information through internal meetings and meetings with external advisors, review of documentation and sources related to known human rights risks, and benchmarking against companies operating in the same industry as OTG. Based on this information gathering, we have assessed the risk of adverse impacts on fundamental human rights and decent working conditions in OTG's own operations, supply chains and business partner relationships. The assessment has taken into account both risk-increasing and risk-reducing factors, including the geographical location of the suppliers/business partners, known industry risks, which products/services they supply to OTG and which raw materials/components are included in the delivery, whether OTG has a stable and long-term relationship with the suppliers/business partners, and whether the suppliers/business partners themselves carry out due diligence in accordance with the Transparency Act.

The risk assessment has formed the basis for prioritising and following up the risks, and for implementing measures (see more about measures in section 6 below).

4 DUE DILIGENCE RELATED TO OUR OWN OPERATIONS

Seagull has no employees of its own, with activities limited to owning and selling/leasing software, as well as owning and investing in subsidiaries. Consequently, there is very limited risk associated with Seagull's own operations.

We also consider the risk of adverse impacts on human rights and decent working conditions in connection with the operations of Ocean Technologies Group, Ocean TG and Seagull's subsidiaries to be low. As explained in section 2, the employees are office workers in units in Norway, the UK, Germany, Poland, Greece, Singapore and South Korea, all of which comply with local laws, regulations and standards relating to decent working conditions, regardless of where the employees work from. General risk factors for office workers include, among others, discrimination, lack of inclusion and diversity and violations of working time regulations. However, OTG has not identified any actual adverse impacts or significant risks of adverse impacts for its employees. Nor have we identified any actual adverse impacts or adverse risks related to impact on external stakeholders, among other things as OTG has no production facilities with associated emissions or similar.

Overall, OTG considers the risk of adverse impacts for human rights and decent working conditions related to our own operations to be low.

5 SUPPLY CHAINS AND BUSINESS PARTNERS

Seagull, Ocean Technologies Group and Ocean TG have largely the same types of suppliers and business partners.

OTG's main suppliers provide hardware and software, as well as delivery and transport services, to the OTG companies. OTG's software is distributed to customers through USB sticks and in some cases PCs. OTG is aware of the general risk factors associated with minerals, metals and other materials used in PCs and USB sticks. Such materials are often mined in areas affected by armed conflict and/or other areas where violations of human and labour rights, such as child labour, forced labour, unsafe working conditions, illegal overtime, pollution of local environments and discrimination, are widespread. The risk is mitigated by the fact that OTG mainly buys USB sticks and PCs through Norwegian suppliers, who are themselves subject to the Transparency Act and with whom OTG has a stable and long-term business relationship. Nor has OTG uncovered any actual adverse impacts for human rights and decent working conditions. Nevertheless, OTG considers this to be a significant risk, and is mitigating it with relevant measures set out at section 6 below. This risk applies to Ocean Technologies Group and Ocean TG, which are the companies that have hardware delivered to them.

With regard to suppliers of software and suppliers of delivery and transport services, OTG has not identified any actual adverse impacts or significant risks of adverse impact for human rights and decent working conditions. Software is supplied by other companies in the global group of which OTG is a part, which themselves comply with ethical requirements and legislation in the countries in which they operate. Delivery and transport services are primarily provided by one supplier in Norway, which is itself subject to the Transparency Act and with which OTG has a stable and long-term business relationship. However, OTG is aware of the risks that generally exist in the industry, for example related to illegal working hours and discrimination. All OTG companies receive software deliveries, while only Ocean Technologies Group and Ocean TG purchase delivery and transport services.

OTG's business partners primarily fall within the categories of professional services (accounting, legal advice, insurance, marketing, etc.), products and services for the offices (furniture, coffee, office supplies, kitchen equipment, etc.), facility management and canteen services. Ocean Technologies Group and Ocean TG have business partners in all these categories, while Seagull only has business partners in professional services. OTG has not identified any actual adverse impacts or significant

risks of adverse impacts for human rights and decent working conditions associated with its business partners.

6 INITIATED AND PLANNED MEASURES

OTG has made contract clauses relating to human rights and labour conditions, and will going forward work to implement these in contracts with suppliers and relevant business partners.

Furthermore, OTG has prepared internal procedures in OTG related to compliance with the Transparency Act, covering both how due diligence should be carried out in practice to identify and manage risks in the best possible way, and how information requests should be answered. In this context, OTG is also in the process of updating our Business Ethics & Conduct Policy to include a new section on human rights and decent working conditions.

Going forward, OTG will also, on the basis of the due diligence we conduct, assess the need for additional risk mitigation measures, for example :


- Prepare and distribute questionnaires relating to human rights and decent working conditions to all OTG suppliers and business partners.
- Review the Transparency Act reports of OTG's suppliers and business partners who are themselves subject to the Transparency Act and assess the need for additional measures.
- Conduct consultations related to working conditions with employees and their representatives, e.g. through employee surveys and meetings with employee representatives
- Engage in dialogue with other companies in the global group of which OTG is a part to ensure that human rights and decent working conditions are respected in connection with the products and services other group companies provide to OTG


We expect these measures to reduce the risk of adverse impacts on human rights and decent working conditions, both in our own operations, in our supply chains and in our business partner relationships. The internal procedures related to compliance with the Transparency Act, as well as the update of our Code of Conduct, are expected to contribute to increased awareness and more accurate due diligence and risk mitigation measures. Through the contract clauses related to human rights and decent working conditions, we aim to ensure that our suppliers and business partners respect and actively work with human rights and decent working conditions. The contract clauses are also intended to strengthen OTG's ability to monitor compliance with our standards related to human rights and decent working conditions, and to enable OTG to take decisive action if actual or potential adverse impacts are identified.

SIGNATURES


30th of June 2025

Seagull AS:

Signed by:

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Keith Proffitt
Chairman of the board

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2EE8A9611987424...
Raket Einevoll Simmenes
Board member


Ocean Technologies Group Norway AS:


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