



## Statement on Due Diligence Assessments under the Norwegian Transparency Act for Allweiler AS, 2026

### Introduction

This report describes how Allweiler AS continuously and methodically works to map, identify, and manage risks and potential negative consequences for human rights and decent working conditions that Allweiler AS may cause or contribute to. It explains how Allweiler AS works to continuously assess and minimize the risk of negative consequences by implementing measures to stop, prevent, and mitigate these at the workplace and in the markets where we operate or deliver products. The purpose of this report is to provide the public with insight into the findings of Allweiler AS in the due diligence assessments we have conducted and the measures that have been implemented.

### General Information about the Company

Allweiler AS (VAT ID: 919 674 237) was established in 1971, currently employs 36 people in Norway, and is a part of the Allweiler Group which has headquarters in Germany, which is wholly owned by CIRCOR Group. Allweiler AS supplies pumps and related equipment to the marine industry, shipping, and offshore sectors. We service all installed Allweiler products with spare parts, replacement pumps, and maintenance.

Allweiler in Norway does not have its own production of any articles but assembles, customizes, and prepares products for final installation at customer sites in its own workshop in Hvalstad, Norway. Allweiler is a value-adding company that both imports and exports goods and services, whether it be physical products or services such as upgrades or maintenance of existing pumps or systems at our customers' sites.

Allweiler has two factories in Europe and two factories in Asia. Allweiler AS imports goods from three of these factories, namely from India and Germany. In addition, Allweiler imports goods from several third-party suppliers abroad, but most external suppliers (outside the Allweiler Group) are located in Norway. Our customer base consists of both Norwegian and international customers with deliveries domestically and worldwide.

### Allweiler AS Commitment to Fulfilling the Law on Human Rights and Decent Working Conditions

The CIRCOR Group's Human Rights Policy, and thereby Allweiler AS's Human Rights Policy, outlines the company's commitment to respecting and promoting human rights in the workplace for its employees and within its operations and business relationships. The guidelines specify the fundamental obligations of the organization and how the company complies with legal and regulatory requirements in the various countries where it operates.

Key elements of the policy include:

- The company's commitment to international human rights frameworks, including the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the Ten Principles of the United Nations Global Compact.
- A commitment to non-discrimination and equality, providing equal opportunities and treatment for all employees regardless of race, gender, religion, or other status.
- Offering and ensuring a workplace free from harassment, discrimination, and unsafe conditions.
- Prohibition of child labor and forced labor in any form.
- Promoting fair compensation and regulation of working hours in accordance with local laws and international standards.
- Conducting regular training for employees on human rights issues and related company policies.
- A reporting mechanism that investigates reports of violations, potential violations, as well as takes mitigation steps in response to complaints.

Allweiler strives to ensure that the scope of this policy applies to all employees, contractors, suppliers, and business partners. Adhering to the highest ethical standards is a paramount Company objective and it proactively seeks to foster a culture of respect for human rights throughout its operations and supply chain. The Human Rights Policy of the CIRCOR Group and Allweiler AS serves as the company's commitment to promoting human rights and acting with integrity every day.

### Allweiler's Work on Sustainability

Allweiler AS depends on the production of physical products and the transportation of goods, which we consider to be the main drivers of our climate impact. The Allweiler Group is working centrally to find savings in both water consumption, energy consumption, and to reduce energy-intensive materials as input factors in the production of our products. Allweiler AS continuously works to reduce our carbon footprint wherever possible.

The Allweiler Group has established global and local goals to reduce pollution and environmentally harmful materials in production. Allweiler AS works to minimize pollution by sorting all categories of

waste. We have entered into agreements with transport companies that offer the most environmentally friendly options for transport. The company has a standing directive that we should always strive to use sea and land modes of transport where possible, with a specific goal to reduce air freight/express freight by 20% compared to the previous fiscal year. Allweiler AS has also requested packaging manufacturers to provide environmentally friendly alternatives to the current packaging material, especially the use of plastic in palletized goods packaging.

### Allweiler's Work on Internal Risk Assessment and Follow-up

To assess internal risks that may affect working conditions at the workplace, Allweiler AS uses an annual employee survey conducted by an external provider. We also conduct a semi-annual safety representative inspection that provides information on general observations and deviations. Additionally, monthly HSE (Health, Safety, and Environment) inspections are carried out in the building.

The annual employee survey is anonymous, includes everyone in the company, and provides management with a good overview of what works well and what works less well regarding equipment, safety, communication, follow-up from the immediate supervisor, etc. This allows management to discuss, evaluate, and implement measures to enhance employees' perception of their role in the company, engagement, and job satisfaction. This survey applies to all employees across the CIRCOR Group, including our own factories in Germany and India, as well as other CIRCOR companies from which we also import products.

The safety representative inspection reveals whether employees need ergonomic equipment, whether there is a need for noise-reducing measures between offices, and generally whether the most important criteria for a good workplace are met by the employer. Necessary equipment is acquired based on the results of this inspection.

The monthly HSE inspection ensures that physical HSE requirements are met, such as fire safety, necessary marking of zones and areas where chemicals, machinery, forklifts, and other equipment representing a risk are present, as well as checking for damage to the building or electrical system. If deficiencies or damages are found, they are documented, and the HSE officer initiates the process of implementing corrective measures.

Allweiler AS offers and requires employees to participate in regular training in HSE, first aid, and tool and machine handling in the workshop.

### Reporting channels

Allweiler has several channels where employees can report deviations.

A whistleblowing routine for critical matters has been developed, as required by law, following the Norwegian Labour Inspection Authority's template. This ensures that employees know where to find information on how to report a matter, regardless of its nature.

CIRCOR Group has its own hotline that all employees can call anonymously if there is something that needs to be reported to a unit other than Allweiler AS, where the employee is not comfortable addressing it with their immediate or senior manager.

## Risk Assessment of Suppliers and Partners

Suppliers of primarily physical products are critical to Allweiler operations, and therefore we consider the risk of negative consequences from suppliers to be very high. It is essential to conduct a thorough survey with a broad selection of our suppliers.

As part of its efforts to comply with the Norwegian Transparency Act (*Åpenhetsloven*), CIRCOR Group has used the IntegrityNext platform globally for Allweiler to carry out and document due diligence assessments in our supply chain. Through this, we also meet the requirements of the German Due Diligence Supply Chain Act (GDDSCA), which largely aligns with OECD guidelines and imposes stricter reporting obligations than the Norwegian Transparency Act.

The Allweiler Group has several overlapping suppliers worldwide and therefore benefits greatly from consolidating risk analysis on a single platform.

IntegrityNext is a digital solution developed for sustainability reporting and supplier monitoring. Through IntegrityNext, we gain access to automated risk assessments based on the supplier's geographical and industry profile, as well as public risk data. The platform enables us to:

- Map and monitor suppliers against international standards and ESG risks
- Collect self-assessments and documentation directly from suppliers via questionnaires covering key requirements related to human rights, ethical trade, and sustainability
- Receive alerts about potential violations through continuous monitoring of news sources and databases
- Document actions and follow-up on identified risk areas as part of our internal due diligence process

The risk analysis underlying the survey focused on external suppliers based on the following parameters:

- Located in countries with high risk related to human rights, corruption, and the environment
- Operating in industries known for high risk
- Among our largest suppliers by procurement value and rated at yellow level in IntegrityNext

As a result, 11 suppliers for Allweiler AS who were invited to participate in an extended assessment, in addition to the 17 who were invited last year. In this assessment, suppliers are asked to document and respond to questions within the following thematic areas:

- Human rights
- Working conditions
- Environment & climate
- Corruption and bribery
- Governance and compliance

In addition, CIRCOR Group has a Code of Conduct that Allweiler AS will require all new external suppliers to sign from Q3 onwards. We will also request our largest existing suppliers to sign as soon as possible to minimize risk in our collaboration and ensure that we do not engage with suppliers who cannot meet our standards as a responsible company committed to human rights and decent working conditions.

Allweiler also uses an End User Statement (EUS) that requires specific information about the end customer for our products. This document must be stamped and signed by the end customer (not a distributor or partner) in all cases where there is uncertainty about the end customer's identity or whether the customer is subject to sanctions, according to the screening tools (e.g., Visual Compliance) we use, integrated into SAP.

CIRCOR Group and the Allweiler Group regularly update a list of Countries of Concern and inform all relevant parties about the requirements for selling products and services to countries not approved for normal trade.

CIRCOR and Allweiler comply with all EU, US, UK, and other sanctions against Russia, both regarding the import and procurement of materials or products, and the sale of products or services to customers who are Russian or may be linked to Russia.

### Findings of Risks among Suppliers

Out of the 28 suppliers invited to complete an extended due diligence assessment, 26 have completed the evaluation. This is considered very positive and indicates strong cooperation, a high degree of transparency, and generally good quality in the suppliers' responses and documentation.

For one supplier who has not completed the assessment, it has been communicated that further procurement will not take place until the requirements have been fulfilled.

The remaining supplier is assessed as having a low risk; however, they have been requested to complete the assessment due to the purchase volume.

No high-risk suppliers have been identified in the completed assessments. Some suppliers have had minor gaps or required clarifications, and these are being followed through dialogue.

The following follow-up actions have been identified:

- One supplier is in dialogue with us to provide additional information related to the handling of hazardous substances. An update is expected once information from their sub-suppliers is received.
- Six suppliers have been requested to establish or clarify procedures for risk assessment and follow-up of their own sub-suppliers.
- One supplier needs to strengthen and document procedures related to the prevention of corruption and bribery.
- One supplier has been requested to update an expired ISO 14001 certification.

All identified matters are considered manageable and are being followed up in dialogue with the suppliers. The deadline for implementation of necessary measures has been set for Q4 2026.

## Measures

As a follow-up, we have implemented the following measures:

- The relevant suppliers have received clear and specific feedback on what needs to be improved or better documented, along with a deadline for resubmission.
- If sufficient information is not received, further actions will be considered, such as additional dialogue, audits, or potential contractual consequences.
- Continuous monitoring in IntegrityNext (sanctions lists, news articles, changes in company profile or status) alerts us throughout the year to significant changes or negative events related to our suppliers.

The results from this year's assessment form the basis for next year's plan. We are gradually expanding the scope to include more suppliers and geographic areas, based on risk assessment and procurement value.

## Overall Summary and Plan for Further Work

The Transparency Act requires Allweiler AS to document and report on risks and measures implemented with its business partners to minimize the risk of human rights violation and decent working conditions. Allweiler AS has conducted a risk assessment of all suppliers, including goods and services.

The work related to the Transparency Act and our suppliers is an ongoing and long-term task that Allweiler AS takes very seriously. We will regularly update the public and those who inquire about our activities related to this work, and we will respond to all inquiries made under the Transparency Act by any stakeholders interested in Allweiler AS's operations.

This report will be published on both the Allweiler AS and CIRCOR Group websites.

Date of signature: 6/26/2026

Signed by:  
Sign.   
8A542C4E1C5A42A...

Michael Gaiser, Board member

Allweiler AS

Date of signature: 6/26/2026

DocuSigned by:  
Sign.   
9A649EEEDDFCE4E4...

Matthias Pro bain, Chairman of the Board

Allweiler AS

