

Due diligence report 2022



Document type	Report
Document Owner	CEO
Document Author	HSSE
Revision no	01
Revision Date	20.06.2023

Introduction

The Norwegian Transparency Act entered into force July 1st 2022. The Act covers all private companies with more than 50 employees and requires companies to map how people in the value chain are affected by the company's operations and products. The Act also requires companies to prioritise the areas where the risk of negative impacts on people is greatest, take action, and report on progress.

The Act further requires companies to report on their work related to the requirements of the Transparency Act.

Horisont Energi

Horisont Energi AS is a Norwegian clean energy company accelerating the transition to a carbon neutral future. Through profitable solutions to produce clean ammonia and large-scale carbon storage, we will contribute to new industry and a cleaner Europe. Our head office is located in Sandnes and in addition we have small offices in Oslo, Edinburgh and Hammerfest. Horisont Energi currently have no construction, production, or operational activities. Our activities are project management and engineering. We have contracts with several Norwegian and European engineering companies. Supply of office goods and services are mainly through local and Norwegian suppliers. Horisont Energi had 44 employees at the end of 2022 and the Transparency act is hence not directly applicable for us.

Due diligence procedure

Horisont Energi has developed and follow a due diligence procedure to identify, prioritise, and manage actual or risks of negative impacts on people throughout our value chain. The procedure is based on the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

The Board of Directors of Horisont Energi is responsible for the organisation's business conduct, for assessing sustainability risks and opportunities, and for evaluating the results of the work undertaken. Our management team is responsible for the work of conducting risk identification and management related to due diligence and has appointed the HSSE function to lead the work.

Horisont Energi conducts due diligence risk assessments prior to entering into key contracts and business relationships. For ongoing relationships, we carry out a due diligence risk assessment as a minimum once a year and whenever there are significant changes in the business. Information or events that affect the overall risk assessment will be included in the risk assessment on an ongoing basis. Based on the information gathered and available, risks are prioritised, which in turn form the basis for an action plan to prevent or reduce negative impacts on people.

The different actions in the action plan are implemented by relevant functions in our organisation and progress and results are followed up on an ongoing basis. Where possible, progress is evaluated using measurement indicators.

The management team is informed of status and progress as a minimum once a year and whenever there are significant changes.

The Board of Directors is informed annually or more frequently if significant changes to the business have been made or high risks have been identified.

Reporting concern or requesting information

Information on how to report a concern or request information is available on our website and is accessible to all internal and external stakeholders. We treat all requests and complaints with great care.

Communication

The results of our risk assessment, actions taken, and their expected outcomes are communicated through this report which is updated annually. The next revision will be included as part of the sustainability report.

Revision

The above steps of risk assessment, implementation, monitoring, and reporting are carried out continuously to capture changes in the risk landscape that may trigger more thorough assessment and new measures.

Result

In spring 2023, we updated our risk assessment. No actual adverse impacts or significant risks of adverse impacts was identified through the assessment. The limited impact is due to the fact that Horisont Energi is in the planning phase of projects and the work is mainly engineering work. The focus now is therefore to prepare for project implementation and operation, and increasing number of suppliers, partners, customers, and employees.

We have identified the following stakeholder groups:

- own workers;
- workers in our supply chain;
- business partners.

Following the risk assessment, we have identified priority areas we are working on. These activities are also included as part of our sustainability report:

- Establish a Supplier Code of Conduct;
- Ensure involvement of the indigenous Sami people in connection with the impact assessment for Barents Blue;
- Arrange ethical and anti-corruption training for all employees;
- Arrange anti-corruption training for Board members;
- Establish a working environment committee when company turns 50 employees;
- Conduct a new working environment survey;
- Look at ways to improve communication and information internally;
- Look at ways to improve training/development for employees;
- Maintain our zero-accident track-record.

These actions will be followed up on a regular basis and has been added as part of the Horisont 2023 Safety and sustainability program.