

TRANSPARENCY ACT REPORT **BRISTOW NORWAY A.S.**

Bristow Norway A.S. (“BNAS”) has prepared this Report dated 19 June 2023, pursuant to Section 5 of the Norwegian Transparency Act (“Transparency Act”). This Report covers the period of 1 July 2022 to 31 December 2022. Please contact Compliance@bristowgroup.com with questions relating to this Report or about how we comply with the Transparency Act.

ABOUT BNAS

BNAS is a wholly owned subsidiary of Bristow Group Inc. (“Bristow Group”), which provides vertical lift solutions to customers around the world, including transport services to the offshore energy industry and offshore search-and-rescue (“SAR”) services to both energy and government organizations. BNAS contracts with energy companies operating in Norway to transport their crews to offshore oil installations in the Norwegian and North Seas and to provide SAR services. BNAS is headquartered in Stavanger and employs 400 people.

OUR COMMITMENT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

BNAS’ commitment to the protection and advancement of human rights in its operations stems from our overarching commitment to conducting business in an ethical and responsible manner. This means being aware of our actions as they pertain to labour, our environmental impact, and risks of corruption throughout our business.

In addition, we are committed to playing a positive role in the communities in which we operate by maintaining a healthy and safe work environment. Bristow Group’s Core Values, Code of Business Integrity, company policies and its Sustainability Report reflect the principles enunciated in the United Nations Universal Declaration of Human Rights, all of which are applicable to and adhered to by BNAS. We meet our commitments, in part, by taking a zero-tolerance approach to the use of slavery and human trafficking, and we recognize that our accountability extends throughout our operations, and we have influence across our supply chain and business partners.

BNAS shows its commitment to human rights by valuing and respecting diversity and inclusivity in the workplace and by respecting human dignity. For example:

- **Non-discrimination:** We do not tolerate discrimination or harassment.
- **Diversity:** We value diversity in the workplace and promote an environment that is inclusive of all people and their unique abilities.
- **Equal Opportunity:** We provide equal opportunity in recruiting, hiring, developing, promoting, and compensating without regard to race, color, religion, gender, sexual orientation, national origin, citizenship, age, marital status, veteran status or disability.
- **Fair wages:** We provide fair and equitable wages, benefits, and other employment conditions in accordance with applicable laws.
- **Freedom of Association:** We respect the rights of our employees to join or form trade unions and bargain collectively. We neither favor nor discriminate against members of trade unions or similar external representative organizations.
- **Slavery, Human Trafficking, Forced Labor and Child Labor:** In accordance with its policies and applicable laws, BNAS will not tolerate behavior in our operations or supply chains that violates a person’s freedom to work voluntarily and without exploitation.
- **Safety and Wellbeing:** BNAS strives to provide a safe and healthy workplace, and we have instituted policies and practices for reporting and preventing accidents, injuries and unsafe conditions for our employees, business partners and communities.



POLICIES AND TRAINING RELATED TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Legal requirements inform our policies, processes and expectations as they relate to managing and mitigating applicable risks in our operations. For example, our Human Rights and Antislavery Policy requires that BNAS creates and enforces systems and controls to ensure that slavery and human trafficking are not taking place in our business or in any of our supply chains. Applicable supervisors, in conjunction with Bristow Group's Legal and Compliance Department, are responsible for ensuring those reporting to them understand and comply with company policy and are provided with appropriate training so employees recognize potential issues, escalate those issues, and take steps to avoid violations. Examples of current processes include:

- COBI and *Human Rights and Antislavery Policy* explicitly prohibit the use of slavery and human trafficking in our supply chain and requires that our employees and suppliers take appropriate steps to mitigate slavery and human-trafficking risks, including, child or forced labour, human trafficking, adherence to labour laws, freedom of association and movement, and the payment of fair wages.
- Employees and suppliers found to have violated these standards are subject to adverse action, up to and including termination of their services.
- As a condition of engagement, our contract templates, including those specific to the purchasing of goods and services, include provisions relating to slavery, trafficking, and adherence to labour laws.
- Prior to onboarding, each of our suppliers is screened against restricted party lists and reviewed for negative media attention.
- Employees must report actual or suspected violations of applicable modern slavery laws immediately, either to their supervisors, to the Bristow Group Compliance Department, or through the Company's Ethics and Compliance Hotline.
- At the time of hire and annually thereafter, employees are required to take ethics-and-compliance training, which includes a section on modern slavery.

BNAS' policy also requires that we conduct appropriate, risk-based assessments and due diligence on our suppliers to ensure that we are mitigating potential and actual risks and that we are not causing or contributing to human rights violations. BNAS also expects its suppliers and other business partners to follow the same standards and that they assess their businesses too, to avoid or minimize risks of modern slavery and abide by the principles and requirements of applicable local laws prohibiting human rights, modern slavery, and other labour-related violations. This requirement is included in our supplier agreements and our *Supplier Commitment on Human Rights* form.

RISK ANALYSIS AND DUE DILIGENCE

As a provider of commercial aviation and SAR services, BNAS relies on a highly skilled workforce, e.g., pilots, maintenance engineers, winch operators, emergency rescue technicians, ground handling, and office-support staff. In addition, all BNAS operations take place in Norway, which ranks low on international human rights indexes, and where local laws safeguard human rights. Accordingly, we do not believe BNAS (or our specific industry) is a high risk for violations of human rights standards or modern slavery. Further, given the inherent necessity for precision and the knowledge of the complexities of aviation and aircraft components, many of our supply-chain partners must also rely on a capable and experienced workforce. For this reason, most BNAS suppliers pose a low risk of adversely impacting human rights and decent working conditions.

BNAS takes a risk-based approach when conducting due diligence on our suppliers and other business partners. We consider factors such as industries/sectors, geography, past behavior, and the level of spend on suppliers. BNAS relies on a network of global suppliers, some of which may be located in countries that pose higher human rights related risks or operate in an industry that has historically relied on young or migrant workers (e.g., textiles, fabrics/clothing).

Based on our risk assessment for 2022-2023, BNAS has not identified any violations or adverse impacts in connection with our operations. In addition, due diligence assessments of our 300 suppliers have not identified violations relating to the safeguarding of human rights and decent working conditions. While we did not find any violations, we did ask certain higher-risk suppliers to sign the Supplier Commitment on



Human Rights form, and a small number of suppliers were provided with a due diligence questionnaire (e.g., those that may source their products from high-risk countries).

BNAS is supported by Bristow Group functions, including the Human Resources Department, the Sourcing/Procurement Team, the Sustainability/Environmental, Social, and Governance (“ESG”) Team, and the Legal and Compliance Department, – functions involved in assessing and addressing human rights and modern slavery risks. These teams work with BNAS and one another collaboratively on the risks and processes reflected in this Report. As a global organization, Bristow Group also complies with the requirements of the UK Modern Slavery Act and the Australian Modern Slavery Act and has published statements in connection with these laws.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

BNAS is currently engaged in an assessment of: (1) our exposure to human rights and modern slavery risks and (2) the effectiveness of our current actions. The goal is to improve our ability to identify, prevent, and mitigate risk. Examples of anticipated enhancements include:

- Mapping and risk-ranking our supply chain;
- Implementing the use of key performance indicators;
- Integrating automated steps in supply-chain processes;
- Improving supplier risk-assessments processes and due diligence questionnaires; and
- Enhancing internal communications and trainings relating to human rights and decent working conditions.

BNAS is committed to improving our human rights and antislavery compliance program, and we will continue to assess best practices and adopt those that strengthen our approach and effectiveness.

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