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Norwegian Transparency Act Report

2025

*Due Diligence Assessments Pursuant to the Norwegian
Transparency Act (Åpenhetsloven)*

United European Car Carriers AS

Published June 2026



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1 Introduction

United European Car Carriers (UECC) AS is subject to the Norwegian Transparency Act and publishes this statement in accordance with Section 5 of the Act. This statement describes the due diligence assessments carried out during 2025 in relation to UECC's operations, supply chain and business relationships. The assessment scope includes suppliers, business partners and activities considered relevant to the annual due diligence process, including activities carried out through different entities within the UECC Group.

The Norwegian Transparency Act aims to promote businesses' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. This statement describes the findings from UECC's due diligence activities and how the company works to identify and assess potential risks within its operations, supply chain and business relationships.

Our due diligence activities are based on the principles set out in the OECD Due Diligence Guidance for Responsible Business Conduct and are adapted to the nature, size and risk profile of our operations and business relationships.

2 About UECC

2.1 Business Activities

UECC is a provider of short-sea RoRo transportation and logistics services, specializing in the transportation of vehicles, rolling cargo and other cargo units throughout Europe and adjacent markets.

We operate an extensive network connecting ports across Europe and work with a broad range of suppliers and business partners supporting vessel operations, port activities, logistics services, procurement and other operational and administrative functions.

As part of our operations, we engage with suppliers and business partners located in multiple jurisdictions and across a variety of service categories. We therefore recognize the importance of identifying and managing potential risks relating to human rights and decent working conditions within our value chain.

2.2 Supply Chain and Business Relationships

The supplier population assessed as part of the annual due diligence process may include suppliers supporting activities carried out through different entities within the UECC Group, where relevant to the assessment scope.



The supplier base includes a broad range of operational and professional service providers supporting vessel operations, logistics activities and corporate functions. Key supplier categories include port agents, stevedoring companies, technical service providers, fuel suppliers, spare part suppliers, survey and claims service providers, chartering counterparties and other professional service providers.

3 Governance and Due Diligence Framework

3.1 Governance, Policies and Expectations

Responsibility for coordinating due diligence activities under the Norwegian Transparency Act is assigned to the Legal & Compliance function. The annual assessment is supported by input from relevant operational functions, including procurement, operations and ship management where relevant.

UECC's approach to responsible business conduct is supported by internal policies and governance documents, including the Code of Conduct and related compliance procedures. Relevant expectations are also communicated through UECC's Third Party Code of Conduct, which sets out expectations relating to human rights, decent working conditions, business ethics and responsible business conduct. The Third Party Code of Conduct applies to suppliers and other third parties providing goods or services to UECC and encourages equivalent standards throughout relevant supply chains.

During 2025, UECC also implemented an internal Norwegian Transparency Act (NTA) Guideline to formalize the annual due diligence process and strengthen consistency in supplier selection, risk assessment, documentation and reporting.

3.2 Due Diligence Methodology

As part of the 2025 assessment, 25 suppliers were selected for review based on a combination of business significance, operational criticality, geographical exposure and representation across service categories. The suppliers selected represented a range of jurisdictions and service categories relevant to our operations. A due diligence questionnaire was distributed to all selected suppliers, and responses were received from nine suppliers, representing 36% of the suppliers included in the assessment.

While not all selected suppliers provided responses during the reporting period, the responses received provided useful information regarding supplier governance arrangements and responsible business conduct practices.



For suppliers that did not respond to the questionnaire, other relevant information available to UECC was considered where appropriate. This included publicly available information, company websites, governance documentation, supplier location, service category and previous assessments.

The assessment included a review of supplier responses, supporting documentation where provided, and consideration of supplier-specific and geographical risk factors. The supplier questionnaire forms one component of our overall due diligence process and is considered together with other relevant information available to the company.

In addition to supplier assessment activities, UECC conducts due diligence of new customers and counterparties as part of its broader compliance framework. This includes risk-based screening and periodic rescreening activities. Where relevant, information obtained through these processes may also contribute to the identification and assessment of potential risks relating to responsible business conduct.

Table 1 - Overview of the 2025 Due Diligence Assessment

<i>Item</i>	<i>2025 Assessment</i>
Suppliers selected	25
Responses received	9
Response rate	36%
Jurisdictions represented	17
Higher-risk jurisdictions included	Turkey, China
Supporting documentation obtained and reviewed	Codes of Conduct, policies and supplier requirements (where provided)
Selection criteria	Business significance, operational criticality, geography, service category
Assessment approach	Questionnaire, document review and desk-based review (where applicable)



4 Geographic and Sector Considerations

The supplier population assessed during 2025 included suppliers operating across a range of jurisdictions and service categories relevant to UECC's operations. The majority of suppliers operated in European jurisdictions generally considered to present relatively low risks relating to human rights and decent working conditions. The assessment also included suppliers with operations or business activities in Turkey, China and several non-European jurisdictions, which were subject to additional consideration as part of the geographical risk assessment.

Geographical risk was assessed using publicly available information and internationally recognized indicators, including Transparency International's Corruption Perceptions Index and other relevant governance and labour rights sources. These indicators were considered together with information obtained through supplier questionnaires, supporting documentation and desk-based assessments.

In addition to geographical exposure, the assessment considered the nature of the services provided. Particular attention was given to operationally critical suppliers, suppliers relying on subcontractors, and suppliers operating across multiple jurisdictions, as these factors may influence the complexity of supply chain oversight and the potential for adverse impacts.

5 Due Diligence Findings and Observations

The due diligence activities conducted during 2025 did not identify any confirmed adverse impacts on fundamental human rights or decent working conditions requiring remediation measures.

No indications of child labour, forced labour or other serious labour rights violations were identified through the supplier assessments performed. Similarly, the assessment did not identify information indicating systematic human rights violations or serious deficiencies in decent working conditions among the suppliers reviewed, including suppliers operating in jurisdictions subject to enhanced geographical consideration.

Supporting documentation, including Codes of Conduct, human rights policies, environmental policies and supplier requirements, was reviewed where provided. The documentation was generally consistent with the information reported through the questionnaire responses and did not identify circumstances requiring escalation or additional follow-up.



Most responding suppliers reported documented policies and procedures relating to human rights, labour standards, anti-corruption, health and safety, environmental management and responsible business conduct. All responding suppliers reported health and safety measures and workplace policies, while anti-corruption commitments were commonly supported through documented policies or Codes of Conduct.

The assessment identified differences in how suppliers manage and document responsible business conduct. While most responding suppliers reported whistleblowing arrangements, documented policies and defined governance processes, the level of detail and scope varied. Variations were observed in areas such as supplier and subcontractor requirements, anti-harassment measures, support for freedom of association and collective bargaining, and the availability of formal mechanisms for reporting concerns.

Variations were also observed in how suppliers extended responsible business conduct requirements to their own suppliers and subcontractors. Several suppliers reported supplier codes of conduct, subcontractor requirements or due diligence processes applicable to their own suppliers, while others reported more limited arrangements.

Overall, the assessment indicates that the principal differences between suppliers relate to how responsible business conduct is implemented, documented and monitored rather than the existence of basic policies or commitments. The most significant variations were observed in supplier oversight practices, whistleblowing arrangements and the extent to which responsible business conduct requirements were extended to suppliers' own subcontractors and business partners.

6 Measures Implemented and Future Improvements

The assessment highlighted opportunities to increase supplier participation in future assessments. UECC will continue to develop its due diligence process through ongoing refinement of supplier selection, risk assessment and documentation practices.

Where considered appropriate based on risk, additional information may be requested from suppliers and publicly available information, governance documentation and other relevant sources may be considered as part of future assessments. Non-response to supplier questionnaires may also be taken into account as part of future risk prioritisation and follow-up activities.



7 Information Requests

Any person has the right to request information regarding how we address actual and potential adverse impacts on fundamental human rights and decent working conditions.

Requests for information relating to UECC's due diligence assessments may be submitted to:

Legal@uecc.com

Requests will be assessed and responded to within the statutory timeframes set out in the Norwegian Transparency Act, subject to any applicable limitations or exemptions under the Act.

8 Approval and Signature

Pursuant to Section 5 of the Norwegian Transparency Act, this statement has been approved and signed in accordance with the requirements set out in Section 3-5 of the Norwegian Accounting Act.



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