

Statement from Bulk – The Norwegian Transparency Act, June 2025

Procurement and Supplier Management Process

Bulk Infrastructure Group has continued its follow-up activities in accordance with established routines, as outlined in previous reports and published on our website, to ensure consistency and regulatory compliance across procurement and supplier management. The Norwegian Transparency Act has led to a revision of the framework agreement for suppliers. It now incorporates the work of complying with the Transparency Act to a greater extent than before. This results in an increased focus on the supply chain within the company, ensuring that all suppliers meet the necessary requirements for transparency and accountability.

Due Diligence 2025

The due diligence process is conducted in line with the OECD's guidelines for multinational companies, divided into five steps as described in the statement filed in June 2024, [Ethics and Compliance - Bulk Infrastructure](#)

In this year's reporting period, we have observed continued improvements in supplier responsiveness. This positive trend may be attributed not only to our strengthened monitoring and follow-up systems, but also to suppliers becoming more familiar with the legislative requirements and recognizing the importance of compliance. These developments have contributed to a more streamlined due diligence process and reinforce our commitment to transparency, accountability, and responsible supply chain practices

Findings

No significant issues or concerns requiring damage control or restoration efforts have been discovered during the assessments made.

Follow-up measures

In the upcoming year, we will continue to build upon the positive outcomes derived from our due diligence assessments of new suppliers and business partners. We are committed to integrating these experiences into our company's daily operations, emphasizing the importance of adherence to our processes, and upholding high standards of business ethics and practices. Also, in order to further enhance these efforts, the organization will appoint new personnel dedicated to overseeing all related obligations, including reporting under the Transparency Act. Additionally, we have invested in advanced tools to conduct more thorough Know Your Supplier (KYS) assessments. This investment will help us improve our vetting process, ensure compliance with all relevant regulations, and produce more comprehensive reports.

Oslo, 19.06.2025

The Board of Bulk Infrastructure Holding AS



Peder Nærbø
Founder and Executive Chair



Francesco Ostuni
Member of the Board



Sebastian Rossavik
Member of the Board



Lars Erich Nilsen
Member of the Board



Jon Gravråk
General Manager











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Final Audit Report

2025-06-20

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